

LDF 290911

ITEM 6.

Copeland LDF Progress

EXECUTIVE MEMBER: Councillor George Clements

LEAD OFFICER: Julie Betteridge

REPORT AUTHOR: Chris Hoban

PURPOSE OF REPORT: To consider the following:

1. Whitehaven Town Centre and Harbourside SPD Issues and Options Consultation Document
2. Outline Consultation Plan for the Whitehaven Town Centre and Harbourside SPD Issues and Options Consultation
3. Core Strategy text: Policies ER7 – ER11 and Sustainable Settlements chapter
4. Update on GVA work on producing the Blueprint and associated work and the impact on the LDF programme - verbal
5. Draft National Planning Policy Framework response

RECOMMENDATION: That the items reported on below are noted and approved as required.

1. WHITEHAVEN TOWN CENTRE AND HARBOURSIDE SPD ISSUES AND OPTIONS CONSULTATION DOCUMENT
 - 1.1 The Whitehaven Town Centre and Harbourside Supplementary Planning Document (SPD) will provide design guidance and promote key development and regeneration opportunities, especially on Regeneration Priority Sites, within the context of the historic setting of the town centre and harbourside areas, and the nationally recognised Conservation Area.
 - 1.2 It will bring together the many regeneration and heritage related studies, strategies and proposals that have been produced over recent years into one place and form part of the Copeland Local Development Framework (LDF). It should also assist with attracting and guiding potential investment by providing greater certainty and a range of useful information for the development industry.
 - 1.3 The Issues and Options document also has taken into account ideas and suggestions put forward during an informal consultation period with local groups, schools and the public over the spring and summer of 2011.
 - 1.4 The Issues and Options document is attached as Appendix Item 1 to this report. The structure of the report is broadly as follows:
 - Introduction, history of Whitehaven and background information
 - Discussion of the issues faced by the town
 - Vision and Objectives for the SPD
 - An assessment of the Character Areas, Development Zones and Regeneration Priority Sites
 - Design considerations
 - 1.5 The document also contains a number of questions to gather feedback about the scope and content of the document and these will also be included on a separate comments form for respondents to give their views.
 - 1.6 The final Issues and Options consultation document will be produced by a graphic designer that the Council has employed on a temporary basis.
 - 1.7 Following approval from the LDF Working Party it is expected that the formal issues and Options consultation for the SPD will take place during October and

November. The responses to this will then inform the draft document when it is produced in 2012.

- 1.8 It is recommended that the LDF Working Party approve the Issues and Options consultation document for public consultation, subject to minor text changes in editing and as agreed during the meeting.

2. CONSULTATION PLAN FOR THE WHITEHAVEN TOWN CENTRE AND HARBOURSIDE SPD ISSUES AND OPTIONS DOCUMENT
 - 2.1 This should be considered alongside Item 1 as it gives details about how we intend to consult with the public on the Issues and Options document.
 - 2.2 The brief summary in Appendix Item 2 outlines the work done to date and the proposed techniques and groups to be consulted during the Issues and Options consultation. This meets, and with the consultation to date will exceed, the minimum requirements that are outlined in the Statement of Community Involvement. We would welcome feedback from Members regarding the proposed activities and groups.
 - 2.3 Members are asked to consider and approve the Consultation Plan subject to any amendments agreed at the meeting

3. DRAFT CORE STRATEGY TEXT: POLICIES ER7 – ER11 AND SUSTAINABLE SETTLEMENTS CHAPTER
 - 3.1 The policies attached in Appendix Item 3 continue the process of providing drafts of Core Strategy and associated Development Management Policies to the LDF Working Party as they are being developed. The policies covered are ER7 to ER11 from the Economic Opportunity and Regeneration chapter, the Sustainable Settlements chapter and all of their associated Development Management policies.
 - 3.2 This is a work in progress but it will give Members an idea of how the Preferred Options version is being converted to the Submission Draft. Some policies in the Economic Opportunity and Regeneration chapter (policies ER1 to ER6) are reliant on the GVA evidence base update and have not been revised yet and are therefore not included for consideration at this stage.

- 3.3 There will be a read-through and discussion session at the meeting. Members are asked to bring their copy of the Preferred Options Report to the meeting with them to help understand the context for these policies.
4. UPDATE ON GVA WORK ON PRODUCING THE BLUEPRINT AND ASSOCIATED WORK AND THE IMPACT ON THE LDF PROGRAMME
- 4.1 A verbal update will be given on progress with the Blueprint, the associated spatial implications work and LDF evidence base updates being undertaken by consultants. The likely delays with this work will impact on the LDF programme and the Working Party will be asked to consider amendments.
5. DRAFT NATIONAL PLANNING POLICY FRAMEWORK RESPONSE
- 5.1 Consultation on the Government's initiative to replace all national planning policy with one single document began on 25th July 2011 with a deadline of 17th October for responses.
- 5.2 In Cumbria it was agreed at officer level to meet to discuss the draft National Planning Policy Framework and its implications and share our thoughts to provide a joint response on all issues that authorities generally agree upon. A record was made of the discussion that took place in the meeting and this now forms the basis of a draft response for Cumbria.
- 5.3 The work to date can be found in Item 5. It should be noted that the document is still currently very much a working draft and will be subject to amendment following feedback from all of the Cumbrian authorities.
- 5.4 Once finalised the response will reflect the issues that were agreed by all Cumbrian authorities. It will then be considered by Cumbria Planning Group (a countywide group with Member and officer representation from all Cumbrian planning authorities) who will submit the response to DCLG.
- 5.5 We would welcome feedback on the points that have been raised in the response to date.
- 5.6 If any issues that we have highlighted are omitted from the final response Copeland Borough Council may also need to submit its own response. Unfortunately it is not yet known whether the Council will need to do this.

- 5.7. It is recommended that Members endorse the joint response that will be made via Cumbria Planning Group. It is also recommended that authority is delegated to the Director of People and Places in consultation with the Portfolio Holder for Housing and Planning to send a Copeland Borough Council response if required.

List of Appendices

Item 1: Whitehaven Town Centre and Harbourside SPD Consultation document

Item 2: Consultation Plan for the Whitehaven Town Centre and Harbourside SPD Consultation

Item 3: Draft Core Strategy text: Policies ER7 – ER11 and Sustainable Settlements Chapter

Item 5: Draft Cumbrian response to the National Planning Policy Framework consultation



Item 6
Appendix Item 1

Whitehaven Town Centre and Harbourside
Supplementary Planning Document
Issues and Options



September 2011

Whitehaven Town Centre and Harbourside Supplementary Planning Document (SPD)

Stage 1: Issues and Options discussion document for Public Comment

The discussion document is available for comment until XXX November 2011.

To view and download an electronic copy of this Issues and Options document, visit the Copeland Borough Council Website: www.copeland.gov.uk

You can also view the document at all libraries in Whitehaven and Copeland Borough Council offices. Paper copies of the document are available on request from the contact details below.

Please make any comments you have on the official Representation Form and send it to:

Strategic Planning Manager
Planning Policy Unit
Copeland Borough Council
The Copeland Centre
Catherine Street
Whitehaven
Cumbria
CA28 7SJ

Telephone: 0845 0548600

Email: ldf@copeland.gov.uk

It would greatly aid the process if you could use the Representation Form that accompanies this document. Additional forms are available from the Council's Planning Policy Team or from the website.

We will generally not acknowledge representations made, however email correspondence should receive an automated receipt. If you do not receive an automated receipt please contact Planning Policy on 0845 054 8600.

If you require a copy of this document in an alternative format, for example, large print, Braille, audio cassette or an alternative language, please call 0845 054 8600.

Contents

1.0 Introduction and Background	4
2.0 Public Consultation	5
3.0 Policy Background	5
4.0 Historical Development of Whitehaven	8
5.0 Key Issues	10
6.0 Options for the Vision and Objectives	19
7.0 Options for Extending the Town Centre Boundary	22
8.0 Site Analyses and Responses	23
9.0 Options for Design Guidance	47
10.0 Transport and Accessibility	57
11.0 The Way Forward, SPD Process and Timescales	61
12.0 Bibliography	62
Appendix 1 Consultation Responses	63
Appendix 2 Whitehaven Historic Character Maps	100

1.0 Introduction and Background

Whitehaven is the earliest post-medieval planned town in England. It is a unique example of late 17th - 18th century town planning as the town was laid out in accordance with a strict design code by a single landowner Sir John Lowther, and his successors. By 1800 a recession had set in from which the town never recovered. This rapid growth and decline resulted in the preservation of the 18th century planned town and many of its Georgian buildings, and defines much of the town's historic character today.

The Whitehaven Town Centre and Harbourside Supplementary Planning Document (SPD) is being prepared to guide future development in Whitehaven Town Centre and Harbourside areas. The SPD will provide design guidance for the development of Regeneration Priority Sites identified in the Borough Council's Adopted Local Plan and Preferred Options Core Strategy and other supporting background documents. It will promote key development and regeneration opportunities, within the context of the historic setting of the town centre and harbourside areas, and the nationally recognised Conservation Area.

The SPD will become one of the material considerations to be taken into account when determining a planning application. The document will form part of the Copeland Local Development Framework (LDF) and is intended to elaborate upon but not revise policies in the emerging Core Strategy for town centre and harbourside development. It should also assist with attracting and guiding potential investment by providing greater certainty and a range of useful information for the development industry.

Whitehaven town centre and harbourside areas have been the subject of many regeneration and heritage related studies, strategies and proposals over recent years, led by a variety of organisations, agencies and partnerships. The key pieces of work which will inform the SPD are:

- A Vision for Whitehaven, Frederick Gibberd Partnership for Whitehaven Development Company (undated)
- Whitehaven Town Centre Small Business Strategy Final Report, Chesterton Plc, 1999
- Whitehaven Town Centre Development Framework, Broadway Malyan , 2006
- Whitehaven Regeneration Programme Implementation Plan, White Young Green (for West Lakes Renaissance), 2007
- Strategic Flood Risk Assessment, JE Jacobs, 2007
- Whitehaven Car Parking Strategy, JMP Consultants Ltd, 2008
- Whitehaven Town Centre and High Street Conservation Areas Character Appraisal and Management Plan, Whitehaven Town Centre Development Guide and Whitehaven Town Centre Public Realm Appraisal, Paul Butler Associates, 2009
- Extensive Urban Survey, Archaeological Assessment and Strategy Report for Whitehaven, Cumbria County Council and English Heritage (undated)
- Cumbria Historic Landscape Characterisation, Cumbria County Council, 2009

2.0 Public Consultation

This is a Consultation document and comments are invited until XXX November 2011.

The Issues and Options document also has taken into account ideas and suggestions put forward during an informal consultation period over the spring and summer of 2011. During this time the Borough Council held a number of workshops and drop in sessions including:

- The Whitehaven Locality Partnership Town Centre Development Group (31st May)
- Copeland Disability Forum Access Working Group (7th June)
- Public Drop In sessions in the town centre (23rd and 28th July)
- A "Tuesday Talkabout" session for Copeland Borough Council employees (26th July)
- A Business and Local Councillor Session (9th August).

A consultation exercise was carried out with the Youth Forum and various youth groups and a number of schools took part in research projects linked to the SPD, including Whitehaven School, and Bransty and Valley Primary Schools. The young peoples' work was displayed in exhibitions at the Drop In sessions and Business/Councillor event.

3.0 Policy Background

The following gives an indication of the relevant policies and principles that the SPD will take account of at national, countywide and local level.

3.1 National Policy

Nationally, planning policy is set out in Planning Policy Statements (PPSs), Planning Policy Guidance notes (PPGs) and Circulars. Regional Planning Guidance was revoked by the Government last year and it is proposed that it will no longer form part of the LDF, once the Localism Bill is enacted in 2012.

PPS1: Delivering Sustainable Development- Development plans should contribute to global sustainability by addressing the causes and impacts of climate change. Planning policies should promote high quality design and mitigate the effects of declining environmental quality through positive policies on design and conservation.

PPS4: Planning for Sustainable Growth – Development plans should prioritise previously developed land and new uses should be found for vacant and derelict buildings, including historic buildings.

PPS5: Planning for the Historic Environment – The LDF should set out a positive, proactive strategy for the conservation and enjoyment of the historic environment. Plans should consider the qualities and local distinctiveness of the historic environment and how these can contribute to the development of the spatial vision.

PPS12: Local Spatial Planning – a planning authority may prepare SPDs to provide greater detail on policies in DPDs.

PPG13: Transport – promotes more sustainable transport choices and greater accessibility by public transport, walking and cycling.

PPS25: Development and Flood Risk – flood risk should be taken into account at all stages of the planning process to avoid inappropriate development in areas at risk of flooding. Where development is exceptionally necessary, policy aims are to make it safe without increasing flood risk elsewhere and where possible reducing flood risk overall.

Draft National Planning Policy Framework (NPPF) – it is proposed that this will replace all current national planning policy guidance with one single document based on a presumption in favour of sustainable development and the need to plan for growth. The Draft document advises that it is important to plan positively for the achievement of high quality and inclusive design for all development and that the Government's objective is that the historic environment and its heritage assets should be conserved and enjoyed for the quality of life they bring to this and future generations.

3.2 Cumbria

Future Generation – A Strategy for Sustainable Communities in West Cumbria 2007-27

6.3 Coastal Renaissance – We will welcome development, refurbishment and new approaches to how we manage our town centres, which will help us create attractive, sustainable places to live, visit and invest We will ensure that new development and essential infrastructure is integrated, of the right scale and with design, landscaping and choice of materials which are of a high quality and respect the character and setting of its location.

3.3 Local Policy

A revised **Community Strategy** for Copeland is currently being prepared and a draft for consultation should be published in the autumn of 2011.

Copeland Local Plan 2001-2016

Policy TCN9: Whitehaven Town Centre Strategy – encourages further shopping, commercial and tourism related development where it effects physical integration between the town centre and harbourside, safeguards important gateways to the town centre, links and vistas, and promotes environmental improvements and traffic management, improved car parking facilities, a bus/rail interchange and high quality design.

Policy TCN10: Whitehaven Town Centre – Lists uses for which planning permission will be granted in the town centre.

Policy TCN12: Town Centre Opportunity Development Sites – Lists sites identified as development opportunities.

Policy ENV26: Development in and affecting Conservation Areas – Development will only be permitted where it preserves or enhances the character or appearance of the Area and views in and out of the Area. Development should respect the character of existing architecture and historical associations, respect landscape features and traditional street patterns and improve the quality of the townscape.

Policy ENV29: Shop fronts in Conservation Areas – Shop fronts should reflect the traditional character of the building and Conservation Area.

Copeland Core Strategy and Development Management Policies Preferred Options, May 2010

Policy ER7 A: Objective to reinforce role of Whitehaven as Principal Town

Policy ER8: Whitehaven Town Centre – Encourages development which consolidates Whitehaven's status as the first and most complete post medieval planned town in the country, improves links and connectivity, enhances the retail function of ground floor premises, diversifies the offer, enhances gateway sites, creates new and improved public spaces, improves integration of new and existing development, maintains high standards of design, diversifies the range of residential accommodation, improves public transport, improves the range of activities, and incorporates strategic redevelopment schemes.

Policy ENV1: Flood Risk and Risk Management – Aims to ensure development is not prejudiced by flood risk.

Policy ENV2: Coastal Management – Promotes the developed coast with strong links to Whitehaven harbour / town centre.

Policy ENV4: Built Environment and Heritage – Aim is to maximise the value of the Borough's built environment and heritage assets by protecting listed buildings, conservation areas and other townscape features and strengthening the distinctive character through high quality urban design and architecture.

Policy DM26: Built Environment and Archaeology – Development proposals which protect, preserve and where possible enhance historic, cultural and architectural character and heritage of historic sites will be supported.

4.0 Historical Development of Whitehaven

The earliest archaeological evidence of prehistoric activity in the Whitehaven area comes from a Neolithic axe found at Howgill Brick Works in 1949. A Stone Circle existed at Yew Bank to the east of Whitehaven, but this has been since destroyed.

Early medieval settlement in the manor of Whitehaven was associated with the Priory of St Bees which was founded c1125. Abbey records show that by the 12th century Whitehaven was a township extending inland from the mouth of the Pow Beck. Coal mining and quarrying were taking place from the early years of the 13th century on the west side of Pow Beck, alongside fishing. By the late 16th century there were eight tenements and cottages and four rooms for bakehouses around the area which later became the market place, after the market charter of 1656. The Pow Beck corridor became an important industrial area which still retains some of its distinctive historic character.

In 1599, following the Dissolution of the Monasteries by Henry VIII, Thomas Wybergh who was related to the Lowther family by marriage, acquired the Whitehaven estate from the Manor of St Bees. In the early 1600s, Wybergh conveyed half of the estate, including coal seams below the estate to the Lowther family. In 1630 the estate was inherited by Sir John Lowther (1582-1637) and it was from this point until the family line died out in the 1750s, that the town experienced the rapid growth and development attributed to three successive generations of the Lowther family.

Sir Christopher Lowther inherited the estate from his father Sir John Lowther in 1642 and began to export sea salt and coal from his estate to Dublin. Chapel Street was laid out in 1642 and King Street in 1645. In 1644 Sir Christopher Lowther died and the estate was left to his son Sir John (1642-1706) who developed a keen interest in town planning and systematically purchased all the land within the town which was not already within his ownership. Sir John did not build houses himself, but granted plots of land to builders and developers and introduced a series of detailed building regulations to ensure a certain architectural standard and design quality in new buildings. In 1675 Sir John purchased his house, "The Flatts" and over the next few years extended the pier and built the ballast wall for the harbour. By 1706 the newer part of the town had been developed. Following Sir John's death the estate passed to his second son Sir James, who repealed many of his father's detailed building regulations, although the regulation for building in continuous rows was retained. To meet the requirements of the growing merchant fleet two bulwarks, a mole and wharfs were developed in the harbour area throughout the 1700s.

New building in Whitehaven attracted large numbers of labourers and the original planned grid became crammed with cheap housing built in the gardens of houses, and whole families occupied single rooms in cellars and attics. Conditions were very overcrowded with little light and no water or sanitation.

The harbour and docks were extended throughout the 17th and 18th centuries to meet the requirements of trade in coal, salt, tobacco, slavery and pottery, and associated ship building and warehousing, and this continued into the 19th century.

However at the beginning of the 19th century Whitehaven's importance declined as other ports such as Glasgow, Liverpool and Bristol experienced rapid growth and development. These ports enjoyed locational advantages over Whitehaven, such as close proximity to large population centres, and the availability of land where port facilities could easily be expanded.

Coal mining and the railways played an important part in the town's development for much of the early to mid-20th century, together with chemical industries in West Whitehaven based at the former "Rhodia/Huntsman" or "Marchon" site. During the later part of the 20th century these industries, together with others associated with the port activities declined, leaving a legacy of sites suitable for a range of uses. In recent years the harbour area has been targeted for a range of environmental improvements and in 1998 a sea lock was installed between Old Quay and North Harbour to create a permanent marina for leisure craft.

5.0 Key Issues

The following have been derived from those identified in the various studies and strategies listed in 1.0 Introduction and Background (and in particular the Paul Butler Assocs Conservation Area Character and Public Realm Appraisals, Conservation Area Management Plan and Development Guide and the Broadway Malyan Development Framework) as well as from comments provided by stakeholders, interest groups and young people submitted during the informal public consultation process carried out over the summer months of 2011 (see Appendix 1).

5.1 Historic Environment

INSERT MAP 1 Listed buildings and Buildings in need of Repair

INSERT MAP 2 Archaeology

- The historic environment is of national significance in terms of its 17th century planned layout and the quality of the town's historic architecture. It has been well preserved but is in need of investment, with many buildings showing signs of deterioration and lack of maintenance and some buildings vacant and in a very poor state of repair. Some post-WW2 changes, particularly to retail frontages and the replacement of traditional materials with man-made alternatives, have diminished the quality and adversely altered the character of the conservation area.

Key buildings in need of investment and sensitive restoration and repair include:

- Former Methodist Church, Lowther Street
 - Former YMCA, Irish Street
 - Former YWCA, Millenium Promenade
 - Somerset House, Duke Street
 - Old Town Hall, Duke Street
 - Union Hall, Catherine Street
- The building code designed and enforced by the Lowther family in the 1700s resulted in very high quality design in the Georgian core. Buildings were required to be constructed at the front of plots immediately adjacent to the streets, were at least three storeys in height and in continuous rows with shared party walls. The resulting three storey buildings are of varying height with a strong vertical emphasis, and are set forward to frame the streetscape, within a formal grid layout.

INSERT MAP 3 The Georgian Core

- The views and vistas through the town centre to the harbour area and landmark features such as the crow's nest, candlestick chimney, the church towers and wooded hillsides framing the town, should be maintained and celebrated. Rooflines and silhouettes are of significant historic interest and should be protected as an important feature of the town centre. "Book end" buildings at the ends of some streets provide a visual "full stop" and views towards these buildings should be protected.

INSERT MAP 4 Views, Vistas, Landmarks and Public Art

- There is a need to accommodate contemporary architecture on Regeneration Priority Sites and to secure high quality design and materials in order to provide an appropriate context to the historic buildings and layout.
- There is a lack of public squares and high quality public open spaces around the town centre area, but there may be opportunities to provide some new spaces and to enhance existing areas around the town centre. Pre-Georgian spaces are primarily associated with the western side of Whitehaven, such as the area around Market Street, whilst Georgian spaces include St Nicholas' Churchyard and Trinity Gardens. Amenity spaces include Castle Park and High Street Recreation Ground. The harbour area forms an attractive promenade. New spaces should not adversely impact upon the built layout of the Georgian town.

INSERT MAP 5. Public Open Spaces

- The peripheral areas and gateways are of a poorer environmental quality, characterised by vacant and underutilised sites and buildings and post war social housing estates. These have an increasingly adverse visual impact on town centre opportunity sites but could be tackled through environmental improvement projects.

INSERT MAP 6. Opportunities for Gateway Enhancements

- The public realm is showing signs of underinvestment and poor maintenance and earlier environmental enhancement projects, such as those around the harbour area, are generally in need of restoration and repair. The strategic overview and palettes of materials identified in Paul Butler Associates Town Centre Conservation Area Public Realm Appraisal should be adhered to.

INSERT MAP 7. Opportunities for Public Realm Enhancements

- The maritime climate poses particular challenges for building and streetscape maintenance, and this will be an issue for strategic opportunity sites with a westerly aspect around the harbour.

- The Harbour area and marina provide a major regeneration opportunity, based on the high quality environment and historic interest. There is a need to market these opportunities more effectively to attract investment.

Question 1(a): Do the points set out in paragraph 5.1 adequately capture the key issues faced by the historic environment in Whitehaven?

Question 1(b): If not, what else do you think should be included?

5.2 Linkages and Accessibility

INSERT MAP 8. Accessibility and Connectivity

- There is poor connectivity between the town centre and harbour areas. The town centre retail core “turns its back” on the harbour, largely due to the nature of the historical port activities such as ship building, tanneries, fish markets etc which were considered noisy, noxious and unpleasant. The proposed development of several Regeneration Priority Sites will offer new opportunities to address this lack of linkages, for instance by breaking through large blocks, physically and visually, and designing buildings with dual frontages.
- The area around Duke Street / Tangier Street requires particular attention to tackle the poor environment for pedestrians and cyclists.
- The poor connectivity between the town centre and harbour areas is exacerbated by a lack of quality, inconsistent signage and low levels of legibility. The provision of “town maps” and public information boards would improve legibility and assist with promoting and linking up visitor attractions such as the Haig Colliery Mining Museum and the harbour.
- There is a lack of cycle facilities and safe routes, despite the town’s position as the starting point for the coast to coast cycle route (C2C). National Cycle Route No. 71 follows Quay Street into Swingpump Lane and along Preston Street, a busy and unappealing gateway route to the town centre, heavily dominated by cars.
- Pedestrian accessibility is also poor, with some routes such as Strand Street and Lowther Street dominated by vehicles and acting as a barrier to pedestrian movement.
- There is also poor pedestrian and cycle access between surrounding residential areas and the town centre and harbour. Distances between housing estates and the town centre are comparatively short, but steep gradients and a lack of safe routes discourage walking and cycling.
- There are poor external linkages and facilities between Whitehaven and surrounding areas. Bus services should be improved by the proposed new transport interchange, but there is also a need to improve passenger facilities at the rail station and rail

services on the Cumbrian Coast rail line. Road access to the M6 follows long and tortuous routes, particularly to junctions to the south.

- The low quality public realm in some areas, such as the blank frontages on Strand Street and service areas at the rear of Market Place shops along Swingpump Lane, is visually aggressive, alienating and discourages pedestrian activity.
- Accessible parking is a significant issue for those with mobility problems. There is generally a lack of adequate dedicated accessible parking both on and off street in the town and there are issues around some users' length of stay, with cars parked in bays all day.
- Proposals for shared surfaces are potentially welcome but could be a cause for concern for those with disabilities, particularly those who are blind or partially sighted and have hearing impairments. The potential for conflict between car users and those with disabilities is considered to be a significant issue requiring careful thought around design and materials.
- Floorscape is important and there is a need to provide adequate dropped kerbs and corresponding contrast tactile surfacing in the correct locations. The lack of dropped kerbs around the harbour area restricts accessibility and requires addressing. Alternatives to cobbles should be provided where appropriate and drainage channels should be flush, rather than dish. Safety measures should be specified in a way which does not diminish the quality and appearance of the historic environment.
- Street clutter such as bollards, A-boards and commercial wheelie bins can be a significant problem and require careful management. There is a lack of accessible public seating around the town centre.
- There is a need to improve accessibility into shops, possibly through the use of conditions attached to grants for shop front improvement schemes.
- Public transport is relatively inaccessible with few raised bus stops in the town centre. The proposed Transport Interchange should provide proper shelter through a building.
- The walkway along the inner harbour wall / Old Quay is not considered to be very safe due to the lack of railings, and uneven surfaces cause difficulties for wheelchair users, the elderly or those with push chairs. There is a need to improve the surface and provide safer barriers.

Question 2(a): Do the points set out in paragraph 5.2 adequately capture the key issues related to linkages and accessibility in Whitehaven?

Question 2(b): If not, what else do you think should be included?

5.3 Economy

- Whitehaven's economy is heavily reliant on the nuclear industry, with a high proportion of residents employed at the Sellafield complex. The future of activities at Sellafield is uncertain, but overall there is likely to be a reduction in employment over the coming years. It is imperative therefore that Whitehaven prospers, and develops its role as a principal town in order to attract investment and provide employment in other sectors such as tourism, knowledge, retailing and other service industries.
- A site adjacent to the Sellafield complex has been identified by the Government as a suitable location for a new nuclear power station, as part of proposals for a new generation of 8 nuclear power plants to be built by 2025. If the proposed new power station is approved, there will be a need to provide temporary accommodation facilities for up to 5,000 construction workers. It is possible that some of the development sites in Whitehaven may be considered suitable for such housing use.
- The construction of a new nuclear power station, associated connection to the national grid, and possibility of other major and / or nuclear developments in the borough, all bring the potential for substantial increases in funding for community infrastructure through developer contributions. There is an argument that such funding could be used to support public realm improvements in Whitehaven town centre and harbour.
- Whitehaven has comparatively low levels of self-employment and small business creation, probably linked to the availability and security of employment at Sellafield.
- There has been a steady deterioration in the quality of shop fronts in the Conservation Area. Many Victorian and Georgian shop fronts have been replaced over time with modern frontages displaying strong corporate identities, and this has had a cumulative negative impact on the intrinsic quality of the historic town centre.(See Map 7)
- Retailing patterns have been changing at a national level and many town centres including Whitehaven are showing signs of stress, such as empty units, lack of investment in general maintenance and repair of buildings, and an increase in the prevalence of budget retailers and charity shops. However Whitehaven's historical interest, attractive Georgian buildings and harbour areas all offer significant opportunities for the development of more specialist retailing activities linked to the tourism industry. Where shop windows are used effectively to provide attractive displays, this has a positive impact on the streetscape of the town centre.
- The market has been in decline for some years but markets in other Cumbrian towns such as Keswick are known to be attractive and thriving and some hold successful farmers' and craft markets. There may be a need to investigate opportunities to diversify the market offer through regular farmers' and continental markets and to

consider changing the number of days the market is held, or to use an indoor market. Improved stalls, changing the stalls' layout to back to back, and better facilities for traders should also be considered.

- There are a number of development sites on the market (see Map 10) but low levels of developer activity and confidence have meant that the sites have remained undeveloped and vacant for some years. The recession poses additional challenges in terms of bringing these sites forward.
- There is considerable potential for the development of new industries in Whitehaven, such as those related to tourism and the Energy Coast initiative.

Question 3(a): Do the points set out in paragraph 5.3 adequately capture the key issues faced by the local economy in Whitehaven?

Question 3(b): If not, what else do you think should be included?

5.4 Tourism and Leisure

- The tourism and leisure markets are presently under developed but there is considerable potential to build these markets and increase visitor numbers in the town.
- Tourist accommodation is considered limited and poor quality, with few good quality hotel bed spaces and a general lack of accredited accommodation and little if any accommodation for large groups.
- The town has potential for a wider range of visitor attractions.
- There is a lack of good restaurants, cafes, bars and evening entertainment which would support a thriving night time economy and encourage visitors to stay over. There is little activity after 5.30-6pm, particularly around the harbour area, and this impacts on the area's attractiveness to boat owners. An increase in the number of events would increase the number of visitors to the town.
- The rather run down and poorly maintained physical environment in some areas detracts from the town's attractiveness as a visitor destination. Interim treatments for temporary events do not necessarily provide an effective solution for longer term maintenance requirements.
- Whitehaven has many examples of public art around the harbour and town centre areas which help to provide visual interest to the public realm. However some are in need of repair and/or replacement such as the inset fish in the paving on the harbour front.
- There are opportunities to promote the town's interesting heritage more effectively, for instance by providing interpretation panels, promoting historic town trails, creating virtual tours etc.
- The town is significant in that it attracts walkers and cyclists embarking on or finishing the coast to coast walking and cycle routes, as well as those with an interest

in sailing due to the presence of a significant leisure marina (see Map 8). However any specialist provision for visitors with these leisure interests remains low key, and there is little evidence of active marketing to encourage a prolonged visit or overnight stay in the town. The marina is considered attractive to sailing enthusiasts due its location close to the town centre, and the presence of lock gates which offer a safe harbour environment even in storms, but the town has few facilities to meet the needs and aspirations of its sailing community. There may be opportunities for Whitehaven to develop closer links to the Solway Firth for leisure craft, diving etc and the harbour could be used for a wider range of water sports.

- The general lack of visitor provision such as public toilets, accessible car and coach parking, signage etc, all require addressing. There is a need for additional public toilets close to the proposed transport interchange / new Tesco store or on the Harbour. Alternatively there may be opportunities to adapt buildings in public ownership to provide public toilets and toilets should be actively managed to maintain a high standard.
- However there are significant opportunities for linking development sites around the harbour to the marina to create a lively, attractive harbour front area with cafes, shops and leisure uses serving the leisure craft / yachting industry. Ideas from the consultation also included a proposal for a harbourside roof top café bar to take advantage of the harbour setting and dramatic skies. The provision of public seating close to the lock gates would assist with making this area more attractive to tourists.
- There may be opportunities around the harbour area to create more play-focused activities to attract families with young children and bring more activity to the harbour area. This would strengthen links to other visitor attractions such as the Beacon and help to develop stronger associations with the sea side and Cumbrian coastal initiatives. The open space of the harbour provides a welcome contrast to the densely developed streets of the town centre.
- Other ideas include a harbourside Lido on the site of the old baths, a beach on the North Shore, or a permanent outdoor market area, as part of a range of activities attractive to tourists.
- There is a need to improve management of the public realm and to tackle issues such as street litter more effectively, to encourage a pride of place and support investor confidence (see Map 7). The water within the harbour sometimes has litter and detritus floating on the surface, and partly-submerged, apparently abandoned boats and this has a negative impact on the area's appeal.
- The former Methodist Church opposite the Civic Hall could be redeveloped to provide a climbing wall or other leisure use.
- Improved signage, heritage trails and interpretation would assist with promoting the town's historic importance to visitors and residents, and help to protect the heritage for the enjoyment of future generations.

Question 4(a): Do the points set out in paragraph 5.4 adequately capture the key issues for tourism and leisure in Whitehaven?

Question 4(b): If not, what else do you think should be included?

5.5 Community

- The Whitehaven Locality is a relatively deprived part of Copeland, and residential communities are noted for problems related to poor health, low educational attainment, low incomes and relatively high levels of unemployment and crime in the IMD 2011. In addition barriers to housing and services, and poor quality outdoor living are identified as issues.
- The Harbour Ward includes the worst affected area in Copeland for incapacity benefit / secure disablement allowance with the highest numbers in the 25-49 years age range. The Harbour ward is also a Hotspot for NEETs (those young people Not in Education, Employment or Training).

Question 5(a): Do the points set out in paragraph 5.5 adequately capture the key issues faced by local communities in Whitehaven?

Question 5 (b): If not, what else do you think should be included?

5.6 Wider Issues

- The SPD will consider changes to the existing town centre boundary, to take in sites to the north around the proposed new supermarket development by Tesco and development sites to the south around Preston Street / Coach Road. This will require careful consideration to avoid possible negative impacts on the town centre through the relocation of town centre businesses to edge of centre locations, and there may be implications for residents' parking.
- The Regeneration Priority Sites identified in the Local Plan and Core Strategy will be targeted as zones for regeneration and redevelopment and the design guidance will be developed specifically for these sites, and any other sites that may come forward in the Core Strategy period.
- There will be a need to link the document closely to the proposed SPD on planning contributions for community infrastructure. The renaissance of Whitehaven would bring significant benefits to the wider Copeland Borough, in terms of service provision, employment opportunities and leisure and tourism facilities.
- Flood risk – many of the Regeneration Priority Sites are within defined areas with a high risk of maritime and fluvial flooding. There will be a need for the SPD to consider design requirements which reduce the risks associated with flooding and promote non-residential uses on the ground floor.

- The design guidance will also need to consider the particular issues associated with Whitehaven's maritime climate, and the impacts of prevailing westerly winds and salt spray on harbour side sites.
- Street Trees and Landscaping – use of street trees should be supported provided that species are appropriate in terms of height, scale and shape. The replacement of overgrown trees along Strand Street should be supported as the trees soften the urban environment and provide shelter and shade. Tree planting in co-ordinated lines, avenues and boulevards should be re-introduced to bring structure, order and consistency to the currently formless areas to the South East of the town centre and to reinstate the former Georgian plantings.

Question 6: Are there any other wider issues that you think require consideration in the SPD?

6.0 Options for the Vision and Objectives

There have been a number of different versions of visions and objectives set out in strategies and initiatives for Whitehaven in recent years.

6.1 Options for the Vision

The Vision should be short and to the point and reflect the Council and its partners' aspirations for the town. The Vision should take an integrated approach to sustainability, promoting heritage-led regeneration and reuse. It should reinforce Whitehaven's local distinctiveness and sense of place, safeguard and enhance the town's historic places and heritage assets and use the historic environment to inspire new development of imaginative and high quality design.

From earlier Visions, the Vision for the Whitehaven Town Centre and Harbourside SPD could include a combination of some or more of the following:

- A thriving town centre with a range of shops and services
- A high quality environment for living, working and visiting
- A town centre which draws upon its industrial and built heritage to create a varied tourism offer
- Distinctive local heritage is protected and enhanced and new development is of a high design quality
- New development is sympathetic in scale and architectural quality to the nationally recognised Georgian town centre and harbour area
- The heritage town and historic port are preserved and enhanced for future generations
- All areas are accessible for pedestrians and cyclists and public spaces are welcoming
- The local economy is thriving and investment in land and buildings demonstrates confidence in Whitehaven's future as a major tourist and retail destination

Question 7(a): Do you agree that the above principles are appropriate to the Vision for the SPD?

Question 7(b): Are there any other points that should be included?

6.2 Options for the Objectives

The objectives should set out clearly and concisely the main aims for the SPD. Objectives for the SPD could include aspects of the following:

Overall

- To provide an integrated approach to development which secures win/win outcomes by protecting the historic environment, ensuring high quality contemporary design in new development and improving accessibility.

Managing New Development in the Town Centre and Harbourside Areas

- To support the development of Regeneration Priority Sites within the wider regeneration framework of the town centre and harbourside areas
- To provide design guidance for new development and alterations to existing buildings in the Conservation Area
- To improve the integration of new and existing development into the urban grain and to set higher standards of architectural and landscape design for all town centre development
- To ensure that all new development meets high standards in terms of quality of design, energy efficiency, safety, security and accessibility, relates well to existing development, enhances public realm, preserves and enhances the quality and character of the conservation area and reinforces develops locally distinctive and high quality places.
- To set high standards for design, materials and maintenance, which will reflect the raised aspirations of the town

Improving Accessibility

- To provide an environment which supports and encourages pedestrians and cyclists
- To improve links and re-establish connectivity between the town centre and harbour
- To enhance key gateway sites and approaches to the town centre
- To create a series of new and improved public spaces as focal points for new life and activity and to establish stronger visual links between the town centre and harbour
- To improve the integration and the prestige of public transport services in the town centre

Tourism and Leisure

- To identify priority zones for investment that will help strengthen leisure and retail activity in the town
- To diversify and expand the range of visitor facilities in the town centre and provide opportunities to enhance high quality contemporary urban living and working in Whitehaven
- To improve the quality of the town centre public realm and open space and provide much better play and recreational facilities

- To support and enhance Whitehaven's distinctive role as a centre for specialist, independent shops set within a high quality historic environment.

Question 8(a): Do you agree that the above principles are appropriate for inclusion in the Objectives for the SPD?

Question 8(b): Are there any other points that should be included?

7.0 Options for Extending the Town Centre Boundary

The Core Strategy considers that it may be appropriate to extend the town centre boundary. Options may include the area northwards around the proposed site for the new Tesco store, and southwards to include sites around Coach Road. This would support new retail development in the area.

In addition a proposal has come forward through the SPD public consultation process to consider extending the town centre boundary to include the area around the Beacon and the Bardywell Lane Regeneration Priority site. The Whitehaven Locality Town Centre Development Group also proposed that consideration should be given to extending the boundary around the Tesco development site to include the old Dawnfresh site around the boatyard / adjacent to the Vertex site, but this area is not considered appropriate for town centre type uses.

Insert Map 9 showing existing boundary and indicative proposed extensions to Town Centre Boundary

<p>Question 9: Do you agree that the Council should consider extending the town centre boundary to include the areas identified in paragraph 7.0?</p>
--

8.0 Site Analyses and Responses

A number of Regeneration Priority Sites are identified in the Preferred Options Core Strategy and Local Plan. For the purposes of the SPD, these could be grouped within "Development Zones". Development Zones within the Conservation Area are based on the Character Areas identified in the Conservation Area Character Appraisal. A further Development Zone, Preston Street / Ginns has been identified outside the boundary of the Conservation Area. The Development Zones and Regeneration Priority Sites are described below.

Insert Map 10 showing Regeneration Priority Sites and Development Zones

8.1 Georgian Grid Iron



Figure 1 Irish Street

The Georgian Grid Iron forms the largest Character Area and incorporates much of the town's retail, commercial and municipal core. It contains a fine collection of Georgian buildings set within the grid-iron pattern of streets planned by the Lowther family in the 17th and 18th Centuries. Although there are no identified Regeneration Priority Sites located within this Character Area at the current time, the area is in close proximity to several development sites around the harbour and Old Town, providing a backdrop and context of historic streetscapes, with views to and from many important landmarks and buildings. This Character Area has significant design implications for all proposed development within and around Whitehaven Town Centre and Harbour Areas. Most of the streets were laid out but only partially developed by the time of Sir John Lowther's death in 1706. It was during the time of his son, Sir James Lowther, that the building plots on the streets began to be truly developed, and all the streets were fully laid out by 1755. The majority of buildings accord with some or all of Sir John Lowther's design regulations and for the most part form continuous rows and occupy the front of their building plots. There is considerable height and roofline variation as although Sir John regulated storey numbers (3 storeys were required) he did not stipulate the height of each storey.

A considerable number of buildings within the area are statutorily listed (see Map 1) and some of the most significant include the tower of St Nicholas Church, the former Methodist Church on Lowther St, Catherine Mill and 151 Queen St which was occupied by the locally prominent Gale family. A local list of buildings of architectural or historic interest should be prepared for the conservation area.

8.2 South Harbour Development Zone

The construction of a pier in this area in 1634 by Sir Christopher Lowther represented the earliest development of a harbour in Whitehaven. This was followed by Merchants Quay (now Sugar Tongue) in 1733-4, the construction of New Pier (now Old New Quay) in 1740-3 and the extension of Old Quay in 1753. West Pier was constructed from 1830-1838. Until the mid-19th century the northern slope of the hillside was occupied by the town's 18th century fortifications, an inn and bowling green, Rosemary Lane and the historic route to St Bees. However the role and appearance of the hillside changed dramatically following the construction of Wellington Pit and the sinking of two mine shafts in 1840 and 1845.

Today only Wellington Lodge, the Candlestick Chimney and other colliery ventilation shafts, Duke Pit Fan House and the line of the former Howgill Inclined Plane which linked the top of the hillside to the harbour's railway network, survive as visible evidence of this industrial past. Old Quay Lighthouse and West Pier Lighthouse provide links to the town's maritime history, and the semi ruinous remains of Whitehaven fort lie at the base of the hillside between Old Quay and Old New Quay. The area therefore contains a variety of unique historic buildings and features which serve as reminders of the town's past and add significant visual interest to the conservation area.

8.2.1 Quay Street Car Park (WTC1)

The Quay Street car park site occupies a level plot fronting onto South Harbour Quayside and Quay Street. The site backs onto the hillside leading up to Mount Pleasant. This is a high profile harbour site that offers potential for high quality development that would enhance the attractive waterfront.



Figure 2 Quay Street Car Park

<p>Strengths</p> <ul style="list-style-type: none"> • Harbourside location in lee of prevailing winds • Views across harbour and out to sea • Attractive hillside backdrop • Good accessibility to Market Place and King Street retail core • Close proximity to tourist destination The Beacon • Suitable for mix of uses • Good sized footprint 	<p>Weaknesses</p> <ul style="list-style-type: none"> • Close proximity to poor quality sites eg surface car park, discount retailers etc • Part of site (Quay Street frontage) overlooks rears of buildings and car park • Site adjacent to sewage pumping station – possible bad neighbour / disturbance / odour issues
<p>Opportunities</p> <ul style="list-style-type: none"> • Site owned by Harbour Commissioners seeking to realise redevelopment potential • May be demand from Sellafield for office space • Proximity to local tourist facilities (The Beacon, Candlestick Chimney etc) and potential tourism markets eg Tourist Opportunity Site • Suitable for a landmark building • Opportunity to create active frontage • Suitable for an upmarket hotel providing accommodation for business and tourist markets 	<p>Threats</p> <ul style="list-style-type: none"> • Council's preferred office site for Sellafield is Albion Square • Ongoing recession and historically low levels of investment and developer activity in Whitehaven • Competition from several other harbourside sites • Deterioration of public realm in surrounding area due to lack of maintenance and underinvestment • Flood risk • The owners require at least an equivalent income stream from an alternative source if car park use is lost to development • If the site is developed it will lead to significant loss of accessible parking in the town and there may be a need to re-provide on a site nearby • The site is used during the Whitehaven Festival and if developed, an alternative site for the concert stage may need to be found

Site Responses

- Encourage high quality development on the site
- Reflect historic building plot widths at street level to encourage a varied street scene
- Encourage development that extends to the site perimeter

- Encourage a range of uses that will provide active street frontages
- New buildings to be a minimum 3 storeys in height
- Heights greater than 3 storeys to be justified in urban design terms
- Limit the overall massing of any development. A collection of forms is preferable to a single mass
- Facades at ground level to extend to back of footpath
- Encourage high quality contemporary building and materials that enhance the historic town centre

8.2.2 Bardywell Lane

Bardywell Lane lies to the rear of the Quay Street Car Park site. The site backs onto the hillside leading up to Mount Pleasant. Together the two sites could combine to offer a high profile harbour site for high quality development that would enhance the attractive waterfront.

<p>Strengths</p> <ul style="list-style-type: none"> • Harbourside location in lee of prevailing winds • Adjacent to development opportunity site WTC1 • Adjacent to attractive building (pumping station) • Attractive hillside backdrop • Good accessibility to Market Place and King Street retail core • Close proximity to tourist destination The Beacon • Suitable for mix of uses • Planning consent granted for 12 apartments 	<p>Weaknesses</p> <ul style="list-style-type: none"> • Close proximity to poor quality sites eg WTC1 (vacant site) and car park • Site constrained by location at the rear of WTC1 and adjoining steep hillside slope – unlikely to be brought forward in isolation. • Site adjacent to sewage pumping station – possible bad neighbour / disturbance / odour issues
<p>Opportunities</p> <ul style="list-style-type: none"> • Site being marketed as a “development opportunity” • May be demand from Sellafield for office space • Potential to link to local tourist facilities (The Beacon), harbour and town centre 	<p>Threats</p> <ul style="list-style-type: none"> • Council’s preferred office site for Sellafield is Albion Square • Ongoing recession and historically low levels of investment and developer activity in Whitehaven • Competition from several other harbourside sites

<ul style="list-style-type: none"> • Suitable for a landmark building if linked to WTC1 • Potential links to tourism markets • Could be included in proposed extension to town centre boundary 	<ul style="list-style-type: none"> • Flood risk
---	--

Site Responses

- Encourage high quality development on the site
- Reflect historic building plot widths at street level to encourage a varied street scene
- Encourage development that extends to the site perimeter
- Encourage a range of uses that will provide active street frontages
- New buildings to be a minimum 3 storeys in height
- Heights greater than 3 storeys to be justified in urban design terms
- Limit the overall massing of any development. A collection of forms is preferable to a single mass
- Facades at ground level to extend to back of footpath
- Encourage high quality contemporary building and materials that enhance the historic town centre

8.3 North Harbour Development Zone

Between 1709 and 1711, the town's Harbour Trustees constructed a breakwater ("The Bulwark") out from the western end of Duke Street. During the 1780's, North Wall was constructed to enclose the eastern side of the harbour and in 1804 North Wall was extended and the Bulwark relocated slightly to the west of its original position. In 1876, the relocated Bulwark was incorporated into a new wet dock, which was named Queen's Dock in honour of Queen Victoria.

In 1998 a sea lock was installed between North Pier and Old Quay to control sea levels and protect the town from tidal flooding. This installation enabled the construction of a permanent marina within the harbour and was accompanied by the creation of Millennium Promenade.

Today North Pier Lighthouse, North Pier and North Wall provide physical links to the town's maritime and industrial heritage. Although currently vacant, the former swimming baths also add considerable visual interest to the character area. Constructed from red sandstone, its principal façade has detailed engravings of a mermaid and Neptune, the Roman god of the sea.

8.3.1 Mark House, the former Victorian public baths and the John Paul Jones Pub, Strand Street (WTC2)



Figure 3 Mark House

The site lies between Strand Street to the southeast and the quayside of the inner harbour to the northwest. It is currently occupied by a redundant 1970's office building, the former Victorian baths and the John Paul Jones public house. The urban blocks are long and narrow and this creates a difficulty in achieving a development solution that provides active frontages on both sides of the block. None of the buildings on the site are listed but there are listed buildings on New Lowther Street and Duke Street.

The site forms a backdrop to the quayside when viewed from the sea approach and any new building on the site that exceeds 3 storeys will be visible particularly from distant views down Lowther Street and Duke Street.

The site has recently been the subject of an RIBA design competition for a mixed use residential / commercial scheme and the proposed development is for a mixed use residential / office use fronting the harbour area.

Strengths	Weaknesses
<ul style="list-style-type: none"> • Prime harbourside location overlooking marina • Westerly aspect with spectacular sunsets • Links to Tangier Street (night time economy), and Lowther Street / King Street (retail core) • In single ownership of local entrepreneur / developer • Design competition – high profile site 	<ul style="list-style-type: none"> • Plot width rather narrow for dual frontage to Strand Street • Site currently turns its back on the town centre (Strand Street / back of King Street) • Poor connectivity - Strand Street acts as a barrier to pedestrians from the town centre • Westerly aspect exposes site to prevailing winds and maritime climate

Opportunities	Threats
<ul style="list-style-type: none"> • This is an outstanding harbourside site and offers the opportunity for a landmark, high quality scheme. • Strong development potential for a range of uses • Potential uses could capitalise on harbour front / marina location – links to yachting industries, tourism etc • Could assist with providing new linkages to the town centre via Strand Street • Potential to introduce active frontages on the harbour, Duke Street and Strand Street • Attractive heritage building could be integrated into a contemporary scheme • Cumbria CC proposals for public realm and transport should enhance surrounding area • The site is adjoined by a group of Grade II Listed buildings to the south which contribute to the high quality setting of the development site • Consultation with local young people suggested that the site could be used for a maritime themed play park 	<ul style="list-style-type: none"> • Low levels of investor confidence • Ongoing recession and historically low levels of investment and developer activity in Whitehaven • Neighbouring site (WTC3) recently developed for retail at ground floor / residential above but evidence of vacant units • Flood risk • Deterioration of public realm in surrounding area due to lack of maintenance and underinvestment • Cumbria CC public realm and transport scheme requires funding • Some consultation responses have indicated a strong local desire to have a traditionally designed building on the site, in keeping with the Georgian harbour

Site responses

- Site redevelopment should be achieved by good quality architecture that improves and enhances the Conservation Area
- Investigate the retention of the public baths' façade as part of a comprehensive scheme
- Maintain and reinforce a route (or routes) between Strand Street and the harbour
- Introduce active frontages on the harbour, Duke Street and Strand Street
- Architectural emphasis to be placed upon the northeast corner to help define the public square
- Acknowledge the nearby listed buildings on Lowther Street and Duke Street and do not detract from or overwhelm their setting
- New development to be taken up to the back of footpath

- New buildings to be a minimum of 3 storeys in height
- Any new building higher than 3 storeys to be of high quality, justified in urban design terms and fully considered from all vantage points

8.3.2 Former Bus Depot and Garage, Bransty Row (WTC4)



Figure 4 Former Bus Depot

The site is located on the corner of Bransty Row and North Shore Road, with a harbourside frontage onto Millenium Promenade. The site is currently vacant following the relocation of the bus depot. The majority of the site is developed as a single building of poor architectural quality which has a negative impact on the streetscene.

<p>Strengths</p> <ul style="list-style-type: none"> • Gateway site on principal route into Whitehaven town centre • Corner plot – potential for frontages on 3 sides (Bransty Row, North Shore Road and Millenium Parade) • Harbour frontage • Views across harbour and marina • Westerly aspect with spectacular sunsets • Proximity to site of proposed new Tesco store 	<p>Weaknesses</p> <ul style="list-style-type: none"> • Site close to another vacant site (WTC5 Former bus station) • Site currently overlooks a large car park, (but this should change if Tesco site is redeveloped) • Westerly aspect exposes site to prevailing winds and maritime climate
<p>Opportunities</p> <ul style="list-style-type: none"> • Proximity to proposed new interchange 	<p>Threats</p> <ul style="list-style-type: none"> • Low levels of investor confidence • Ongoing recession and historically

<ul style="list-style-type: none"> • Proximity to site for proposed new Tesco store • Outline planning consent for commercial use ground floor, residential above • Some developer interest including a possible hotel • Close to Tangier Street – night time economy • Opportunity to create active frontages • Cumbria CC proposals to change layout of junction at George St / Bransty Row / Tangier St 	<p>low levels of investment and developer activity in Whitehaven</p> <ul style="list-style-type: none"> • Nearby site (WTC3) recently developed for residential and retail at ground floor but evidence of vacant units • Deterioration of public realm in surrounding area due to lack of maintenance and underinvestment • Cumbria CC require funding for public realm / transport proposals • May require interim action to tackle poor condition of buildings and general poor quality environment
--	--

Site responses

- Repair the urban grain and seek good quality development on the site
- Repair the line of Tangier St / Bransty Row and infill the forecourt to the southeast of the site
- Introduce active frontages at ground level on all sides, particularly on Bransty Row and the Millenium Promenade
- Confine service access to the side street of Bransty Row
- New buildings to be taken up to the back of footpaths
- Northeast and southeast corners to exploit distant views from Bransty Row and George St with emphasis on height and detail
- New buildings to be no less than 3 storeys in height
- Heights greater than 3 storeys to be encouraged on the harbour frontage
- Where heights exceed 3 storeys, the architectural quality should be particularly high and the overall form justified in urban design terms
- Encourage high quality materials and details that enhance the character of the town centre

8.3.3 Former Bus Station and Works, Bransty Row (WTC5)

The site is located between Bransty Row and Wellington Row. The majority of the site was previously used as a bus station but is now vacant. Buildings cover the entire footprint.

<p>Strengths</p> <ul style="list-style-type: none"> • Gateway site on principal route into Whitehaven town centre • Strong frontage with curved line • Proximity to site of proposed new Tesco store 	<p>Weaknesses</p> <ul style="list-style-type: none"> • Change in site levels • Site comprises 2 smaller sites, largely partitioned by other uses • Site segregated from town centre by George Street • Currently overlooks large car park (but this should change if Tesco site is redeveloped and car park relocated to rear of building)
<p>Opportunities</p> <ul style="list-style-type: none"> • Proximity to proposed new interchange • Outline planning consent for residential scheme with car parking at a lower level • Some developer interest including a budget hotel chain but car parking may be an issue • Close to Tangier Street – night time economy • Attractive character of neighbouring Wellington Row. • Opportunity to create active frontages • Cumbria CC proposals to change layout of junction at George St / Bransty Row / Tangier St • Consultation with local young people suggests that there is demand for leisure and retail uses in this area. Ideas included a BMX track, laser quest, sports shop, aquarium, clothing store, café, bike track, 	<p>Threats</p> <ul style="list-style-type: none"> • Low levels of investor confidence • Ongoing recession and historically low levels of investment and developer activity in Whitehaven • Competition from nearby sites, including several with harbour frontages • Nearby site (WTC3) recently developed for residential and retail at ground floor but evidence of vacant units • Deterioration of public realm in surrounding area due to lack of maintenance and underinvestment • Cumbria CC require funding for public realm / transport proposals • May require interim action to tackle poor condition of buildings and general poor quality environment

fishing tackle shop, bowling alley, skate park, go-kart track, soft play area, hotel, and slot machines	
---	--

Site responses

- Introduce active frontages at ground level, particularly on Bransty Row
- New buildings to be taken up to back of footpaths
- Building line on Bransty Row to retain curved line (following Bransty Beck)
- Create new footpath on Wellington Row
- New buildings to be less than 3 storeys in height. Where heights exceed 3 storeys the architectural quality should be particularly high and the overall form justified in urban design terms
- Greater height in Bransty Row to be encouraged to terminate the Tangier St vista
- Building heights to exploit the sloping profile of the site
- Retain vista of Candlestick Chimney from Wellington Row

8.3.4 Gough’s Car Park, Strand Street / Marlborough Street

Gough’s car park is located on the corner of Marlborough Street and Strand Street. The site is occupied by a surface car park.

<p>Strengths</p> <ul style="list-style-type: none"> • Corner plot with access off Strand Street • Just set back from harbourside • Sheltered from prevailing westerly winds by building off North West boundary 	<p>Weaknesses</p> <ul style="list-style-type: none"> • Lack of harbourside frontage • Poor quality public realm in Strand St area
<p>Opportunities</p> <ul style="list-style-type: none"> • Potential frontage on Strand Street • Opportunity to introduce active frontage at ground level to Marlborough St and Strand St • Potential to extend site to include joiner’s workshop to provide a harbourside frontage • Potential to provide a beer garden / 	<p>Threats</p> <ul style="list-style-type: none"> • Flood risk • Ongoing recession and historically low levels of investment and developer activity in Whitehaven • Competition from several other harbourside sites • Deterioration of public realm in surrounding area due to lack of

<p>open space area opposite the Vagabond and Irish Bar</p>	<p>maintenance and underinvestment</p> <ul style="list-style-type: none"> • Poor quality building in operational use (as a joiner's workshop) adjoins site on harbourside • If the site is redeveloped the disabled rear access and disabled parking serving the solicitor's business will require re-provision
--	---

Site responses

- Repair the urban grain and seek good quality development on the site, possibly in conjunction with the adjacent workshop site
- Acknowledge the original Georgian plot widths and convey a degree of vertical subdivision in any future development
- Introduce active frontages at ground level to Marlborough St and Strand St
- New buildings to be taken up to back of footpaths
- Any onsite parking to be concealed from public view ie within an inner courtyard or underground
- Realign the splayed corner to the site to reinstate a 90° corner at Marlborough St / Strand St in order to reinforce the building line on both streets
- New buildings to be no less than 3 storeys in height
- Buildings greater than 3 storeys in height to be fully justified in urban design terms
- New buildings should consider greater emphasis (height and detail) at the corner of Marlborough St and Strand St

8.4 Old Town Development Zone

Old Town is the area of Whitehaven which was developed prior to the involvement of the Lowther family, when the settlement was just a small fishing village. Early buildings were located on the south western side of a small stream (Pow Beck), and development was densely clustered around Quay Street and Swingpump Lane. A market charter was granted in 1656, and Market Place became the commercial centre. The street pattern is organic, in striking contrast to the more formal Georgian Grid Iron layout.

There are elevated views over the town centre from Rosemary Lane and views to the harbour from Market Place, Swingpump Lane and Quay Street. There are views into the area from King Street and Roper Street.

The buildings provide a physical record of the town's historical evolution and development. Of particular significance is the Grade II Listed Market Hall, and Grade II Listed 44-45 Irish

Street (the former YMCA building) which was built by wealthy merchant James Milham after 1713 and set back from the street with two wings to provide warehouse accommodation, and a courtyard. The majority of buildings are three storeys high and there are many surviving elements of traditional shop fronts in the commercial core including stallrisers, pilasters, corbels, fascia boards and signage.

The area has been identified for a possible bid for Townscape Heritage Initiative funding from the Heritage Lottery Fund. It is proposed that if successful, the funding would be used for a range of building repairs and improvements including restoration of heritage shop fronts, training and education, and some limited public realm improvements.

8.4.1 Albion Street North (WTC8)

Albion Street North is bounded by Swingpump Lane, Albion Street, Rosemary Lane and the multi storey car park. Today the site is occupied by a scrap yard and a public house. The site is in a prominent location on the south west approach to the town centre and in its current condition has a negative impact on the gateway.

<p>Strengths</p> <ul style="list-style-type: none"> • Gateway site on principal route into Whitehaven town centre • Strong frontage • Attractive hillside backdrop • Good accessibility to Market Place and King Street retail core • Suitable for mix of uses • Good sized footprint (0. 27ha) and linked to neighbouring site WTC9 (0.23ha) • Parking provision on neighbouring site (multi storey car park) 	<p>Weaknesses</p> <ul style="list-style-type: none"> • Complex site ownership and may require CPO to assemble • Change in site levels • Adjacent to unsympathetic multi storey car park • Pub and chimney to remain so design will need to take account of these • Close proximity to other vacant sites eg WTC9 and YMCA building
<p>Opportunities</p> <ul style="list-style-type: none"> • Outline planning consent for office block linked to neighbouring site WTC9 • Council's preferred site for office workers from Sellafield • Should benefit from CCC proposals for public realm / traffic management improvements at junction Irish St / New Town for Albion Square • Close proximity to proposed THI 	<p>Threats</p> <ul style="list-style-type: none"> • Delay in funding for office scheme by nuclear partners (BECWC) • Complex land ownership issues remain unresolved – will probably require a CPO • Cutbacks in public sector funding may impact on deliverability of CCC proposals for Albion Square • There is a need to provide sufficient parking for building occupants and

scheme	visitors <ul style="list-style-type: none"> • There are local concerns about the contemporary design of the proposed building and the resulting impact on the Georgian heritage of the town
--------	--

Site responses

- Repair the urban grain and encourage good quality contemporary development on the site
- New development to acknowledge the variety of historic plot subdivision and the resultant rhythm to the street frontage
- Encourage good quality dense development on the site particularly on the periphery
- Encourage uses on the site that will enhance the area
- Entrances to front onto the street
- Building heights to be no less than 3 storeys
- Heights greater than 3 storeys may be appropriate and should be justified in urban design terms
- Encourage the retention of the Dusty Miller pub and Chimney as part of a comprehensive redevelopment
- New developments to achieve a balance of scale and massing with retained buildings and the adjacent multi storey car park.
- New developments to mask the blank elevation of the multi storey car park as viewed from the south west approach
- Encourage emphasis of the south east and north west corners of the site to exploit distant views
- Encourage materials and detailing that reflects and enhances the conservation area

8.4.2 Albion Street South (WTC9)

The site is contained within a block that extends from New Town westwards to Rosemary Lane, and Albion St to the north. Many of the former buildings have been removed to leave a random group of buildings and enclosed yards. A scrap yard and garage remain on the site.

<p>Strengths</p> <ul style="list-style-type: none"> • Gateway site on principal route into Whitehaven town centre • Strong frontage • Highly visible from Irish Street approach • Attractive hillside backdrop • Good accessibility to Market Place and King Street retail core • Suitable for mix of uses • Good sized footprint (0.23ha) and linked to neighbouring site WTC8 (0.27ha) • Parking provision on nearby site (multi storey car park) 	<p>Weaknesses</p> <ul style="list-style-type: none"> • Complex site ownership and may require CPO to assemble • Change in site levels • Close to unsympathetic multi storey car park • Close proximity to other vacant sites eg WTC8 and YMCA building
<p>Opportunities</p> <ul style="list-style-type: none"> • Outline planning consent for office block linked to neighbouring site WTC9 • Council's preferred site for office workers from Sellafield • Would benefit from CCC proposals for public realm / traffic management improvements at junction Irish St / New Town for Albion Square • Close to area identified for proposed THI scheme for heritage led regeneration 	<p>Threats</p> <ul style="list-style-type: none"> • Delay in funding for office scheme by nuclear partners (BECWC) • Complex land ownership issues remain unresolved – will probably require a CPO • Cutbacks in public sector funding may impact on deliverability of CCC proposals for Albion Square

Site Responses

- Repair the urban grain and seek good quality development on the site
- New development to extend to the back of footpath on New Town to maintain a strong building edge
- New developments should be presented in a collection of forms rather than a single mass
- Building heights should be less than 3 storeys
- Heights greater than 3 storeys should be accommodated within the interior of the site and justified in urban design terms

- Encourage uses that will improve and enhance the area. The proximity of the multi storey car park should enhance a number of uses
- Encourage high quality design terminating the vista along Irish St and at the corner of Albion St and Swingpump Lane
- Encourage good quality contemporary design that acknowledges the character of the town
- New developments to use details and materials that enhance the character of the town
- Office development may be more appropriately located close to the proposed Transport Hub to avoid further traffic congestion

8.4.3 Former YMCA Building, 44-45 Irish Street



Figure 5 Former YMCA 44-45 Irish St

The site is occupied by a former merchants' house dating from the 18th century, with later added extensions to the rear. The building is Listed and occupies a prominent position on the corner of Irish Street and New Town, with views down James Street and Market Place. It is currently vacant.

Strengths	Weaknesses
<ul style="list-style-type: none"> • Landmark historic building on a corner site with a strong frontage • Located off a gateway route into Whitehaven town centre • Set within attractive Conservation Area amongst historic buildings along Irish Street • Highly visible from James Street and 	<ul style="list-style-type: none"> • Side elevation adjoins weak, poorly defined area of public realm off New Town • Unattractive views to exposed rear of site from New Town area • Close proximity to other vacant sites (WTC8 & WTC9) • Possible access issues due to location

<p>New Town approaches</p> <ul style="list-style-type: none"> • Good accessibility to Market Place • Views along attractive shopping area • Additional development opportunities in the former garden and the site of the sports hall 	<p>on a one way street (Irish Street)</p>
<p>Opportunities</p> <ul style="list-style-type: none"> • Opportunity for a quality development through sensitive restoration of a Listed Building • Site adjoins 2 groups of Grade II Listed Buildings on Irish Street and Howgill Street. • Jointly owned by a housing association and the Howgill Centre who wish to redevelop the site as a Foyer project • Shop unit on front • Located close to multi-storey car park • Site adjoins Strategic Opportunity Site WEOS2 to the rear – may be opportunity to develop sites together • Potential to link with sites to the rear currently occupied by the Royal Mail sorting office and Jackson’s Timber Yard to create a larger development opportunity site • Located close to the C2C starting point and route and could provide an opportunity for tourist accommodation for cyclists • Possible key / critical building for THI scheme and within boundary identified for THI bid 	<p>Threats</p> <ul style="list-style-type: none"> • Potential cost of restoration and redevelopment for a Listed Building • Low levels of investor confidence • Ongoing recession and historically low levels of investment and developer activity in Whitehaven • Competition from alternative proposal for a Foyer facility

Site responses

- Retain and sensitively restore the historically important Irish Street façade
- Upgrade rear buildings that are now visible from New Town
- Encourage good quality uses that are appropriate to this quarter of town

- The front courtyard should be retained and sensitively landscaped. The court should not be used for any parking. The street edge should be reinforced by the reinstatement of original walls and railings
- Limit the height of buildings to the rear of the site to 3 storeys to avoid any structures being visible above the main façade as seen from Market Place
- Ensure the façade colour and materials contribute to the character of the town centre

8.5 Preston Street / Ginns Development Zone

This area forms a wide corridor on a major approach to the town centre, and lies outside the Conservation Area boundary. The area is strongly associated with Whitehaven’s industrial past, and the term “Ginns” takes its name from the vertical machines used in the area in the 18th Century to draw coal and water from the pits. By the beginning of the 19th Century, there were three potteries, a copperas, and a paint and colour manufacturers, as well as numerous workers dwellings housing around 8-900 residents.

With the decline of these and later industries the area has become run down and the road is lined with vacant sites, derelict buildings or poor quality recent developments, mainly large scale retail outlets. The corridor suffers from a high degree of fragmentation and lack of active street frontage and there are significant opportunities for large scale redevelopment .

8.5.1 Jackson’s Timber Yard and adjoining land, Newtown/Catherine Street (WEOS2)

The site is located at the termination of Catherine Street, extending to New Town. It is currently occupied by a timber yard business and comprises a collection of buildings and yards of little architectural significance. It was identified in the Conservation Area Appraisal as a site within the Old Town Character Area, but the site lies outside the boundary of the Conservation Area and for the purposes of the SPD, it may be more appropriate to consider the site within the Preston St / Ginns Development Zone.

Strengths	Weaknesses
<ul style="list-style-type: none"> • Large site (0.47 ha) • Site adjoins rear of YMCA site • Suitable for a range of uses 	<ul style="list-style-type: none"> • Lack of strong frontage onto main route (but western boundary set back from New Town) • Site access currently at the end of a lengthy cul-de-sac through a built up area • Poor quality public realm to west and south of site and neighbouring uses tend to be budget retail sheds, garages, car cleaning etc

<p>Opportunities</p> <ul style="list-style-type: none"> • Site adjoins rear of YMCA site potential to develop sites jointly? • Site adjoins Grade II Listed Buildings (YMCA building) and group of buildings on Howgill Street, which enhance the quality of the setting around the site 	<p>Threats</p> <ul style="list-style-type: none"> • Site in existing use and occupied by a successful business • Low levels of investor confidence • Ongoing recession and historically low levels of investment and developer activity in Whitehaven • Flood risk
---	---

Site responses

- Encourage good quality uses that are appropriate to this quarter of town and that will improve and enhance the area.
- New developments should be presented in a collection of forms rather than a single mass
- Building heights should be less than 3 storeys
- Encourage high quality design terminating the vistas along Catherine St and Howgill St

8.5.2 West side of Preston Street (WEOS3)

This site is located on Preston St, an important gateway into Whitehaven. It is occupied by several businesses including garage and cycle shop in a collection of modern buildings and yards.

<p>Strengths</p> <ul style="list-style-type: none"> • Gateway site on principal route into town centre (Preston Street) • Lengthy frontage • Attractive wooded hillside backdrop • Good access 	<p>Weaknesses</p> <ul style="list-style-type: none"> • Site comprises range of smaller sites in varying ownership and occupied by different uses • Poor quality public realm in Preston Street area and neighbouring uses tend to be budget retail units, garages, car cleaning etc
<p>Opportunities</p> <ul style="list-style-type: none"> • Development potential for a range of uses • Site could offer potential to extend edge of centre retail uses and 	<p>Threats</p> <ul style="list-style-type: none"> • Ongoing recession and historically low levels of investment and developer activity in Whitehaven • Competition from other, more

<p>concentrate such activity in the Preston St area</p> <ul style="list-style-type: none"> • The wooded area to the rear could be improved through better landscape management 	centrally located town centre sites
---	-------------------------------------

Site responses

- Encourage good quality uses that are appropriate to this quarter of town and that will improve and enhance the area.
- New developments should be presented in a collection of forms rather than a single mass
- Building heights should be less than 3 storeys
- Encourage high quality design

8.5.3 West side of Ginns (WEOS4)

This site is elevated above Ginns, an important gateway into Whitehaven. It is occupied by various businesses housed in a collection of modern buildings and yards.

<p>Strengths</p> <ul style="list-style-type: none"> • Gateway site on principal route into town centre (Ginns) • Strong frontage • Attractive wooded hillside backdrop • Good access 	<p>Weaknesses</p> <ul style="list-style-type: none"> • Site comprises range of smaller sites in varying ownership and occupied by different uses • Poor quality public realm in Ginns area and neighbouring uses tend to be budget retail units, vacant sites, workshops, housing etc
<p>Opportunities</p> <ul style="list-style-type: none"> • Development potential for a range of uses • Site could offer potential to extend edge of centre retail uses and concentrate such activity in the Preston St area • The site could be improved through a temporary landscaping scheme (eg to provide a park) and then re-developed to provide an industrial area at a later date 	<p>Threats</p> <ul style="list-style-type: none"> • Ongoing recession and historically low levels of investment and developer activity in Whitehaven • Competition from other, more centrally located town centre sites, or larger sites along the Preston St / Ginns corridor

Site responses

- Encourage good quality uses that are appropriate to this quarter of town and that will improve and enhance the area
- New developments should be presented in a collection of forms rather than a single mass
- Building heights should be less than 3 storeys
- Encourage high quality design

8.5.4 Former Council depot and adjoining land at Ginns (WEOS5 & 6)

These sites are formed from an extensive area of vacant land, surface car parks, former workshops and terraced housing. There has been interest in the site in the past from a major retailer for a supermarket. The site is in a prominent position on the corner of 2 important approaches to the town centre, Ginns and Coach Road and at present the site presents a negative visual image.

<p>Strengths</p> <ul style="list-style-type: none"> • Gateway site on principal routes into town centre (Ginns, and across town (Coach Road) • Lengthy frontages onto Coach Road and Ginns • Good access 	<p>Weaknesses</p> <ul style="list-style-type: none"> • Site comprises range of smaller sites in varying ownership and occupied by different uses • Site crossed by cyclepath • Poor quality public realm in Ginns area and Coach Road • Neighbouring uses tend to be budget retail units, vacant sites, workshops etc
<p>Opportunities</p> <ul style="list-style-type: none"> • Development potential for a range of uses • Site could offer potential to extend edge of centre retail uses and concentrate such activity in the Preston St area • Could be suitable for a range of uses eg small workshops / starter units • Recent closure of Focus DIY could provide an opportunity to extend the site and link to the retail units • Possible potential for coach parking facility if services provided and this 	<p>Threats</p> <ul style="list-style-type: none"> • Ongoing recession and historically low levels of investment and developer activity in Whitehaven • Competition from other, more centrally located town centre sites, or larger sites along the Preston St / Ginns corridor • Flood risk

could complement the workshops idea if linked to local artisans – starter units for new businesses	
--	--

Site responses

- Encourage good quality uses that are appropriate to this quarter of town and that will improve and enhance the area
- New developments should be presented in a collection of forms rather than a single mass
- Building heights should be less than 3 storeys
- Encourage high quality design

Question 10(a): Do you agree that the above identified Regeneration Priority Sites are the key development opportunities in Whitehaven?

Question 10(b): If not, are there any other sites which you think should be identified? Please explain your answer.

Question 11(a): Do you consider that the site responses to the Regeneration Priority Sites are appropriate?

Question 11(b): Please explain any suggestions for changes.

8.6 Other Development Opportunities

Other identified development opportunities around the town centre include:

- The former Methodist church, Lowther Street



Figure 6 Methodist Church

- YWCA building, Millenium Promenade

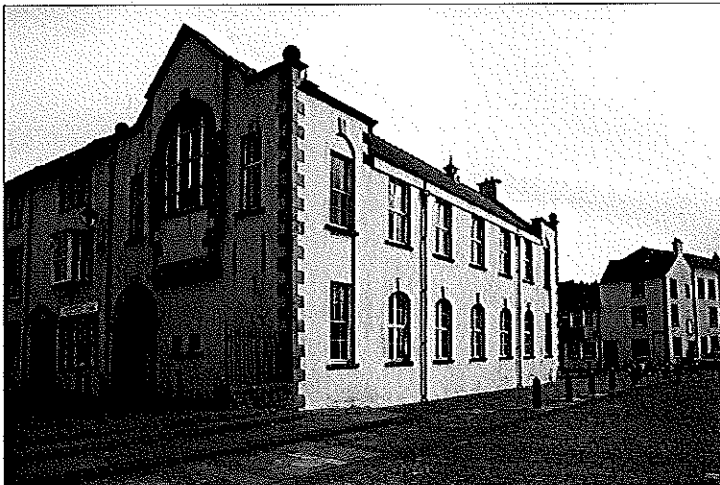


Figure 7 Former YWCA

- Somerset House

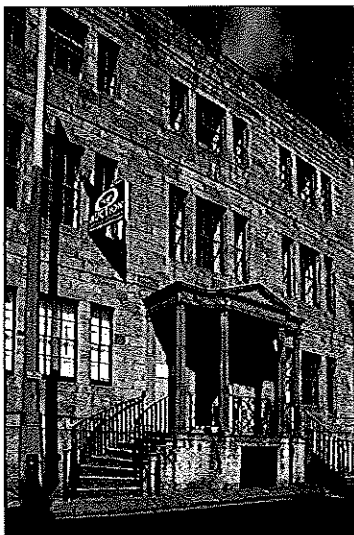


Figure 8 Somerset House

Union Hall



Figure 9 Union Hall

Old Town Hall

(Insert picture)

9.0 Options for Design Guidance

It is essential that changes to Whitehaven's town centre are well-considered and are of high quality. These design principles have been drawn from the Whitehaven Town Centre and High Street Conservation Areas Development Guide (2009) and their purpose is to promote a greater appreciation and understanding of the town's historic character, and to help ensure that development proposals are sympathetic to their context and are of high quality design.

9.1 General Design Principles

9.1.1 Urban Grain

- Do not amalgamate blocks where permeability may be compromised
- Reinststate historic urban blocks that have been lost
- Maintain the permeability of the town and encourage reinstatement of lost historic routes
- Encourage subdivision of new blocks to enable greater permeability towards the harbour
- Retain the cohesive rhythm of the town's street frontages based upon the historic building plots. Proposals that depart from this must be of high quality, fully justified in design terms and not detract from the overall streetscene
- Do not amalgamate building plots where the historic rhythm of the street frontages may be compromised
- Large developments should be located where they can be accommodated without disrupting the historic urban grain
- Infill developments should recognise the rhythm and arrangement of openings of adjacent facade

9.1.2 Density and Mix

- Retain and enhance the dense layout of the historic town centre
- Retain and enhance the historic courtyards and lanes
- Retain and reinforce the activity along all streets
- Encourage opening-up of blank facades facing the street to introduce activity
- Encourage high quality re-development of gap sites and surface car parks fronting onto streets
- Encourage sensitive re-use or conversion of vacant buildings and upper floors
- Encourage leisure and retail usage to the harbour frontage
- Encourage greater commercial usage within the town centre to support existing facilities, and
- Encourage uses that will attract visitors to the town in the evening and weekends

9.1.3 Height and Massing

- Retain the predominant building height of 3 storeys
- Respect traditional roof shape and silhouette
- Height differences between adjacent buildings is consistent with the town's character but this should not exceed a full storey height
- Proposed building heights greater than 4 storeys must be of high architectural quality and fully substantiated in urban design terms
- Encourage increased building height and high quality design on important street corners, at the termination of vistas, on the harbour frontage and on the periphery of the town. Ensure that any significant increase in height is assessed from all vantage points
- Buildings whose massing, scale and shape conflicts with the predominant pattern of the town centre must be of high architectural quality, fully substantiated in urban design terms and not detract from the overall street scene
- Maintain existing views and vistas and
- Encourage the creation of new views and vistas

9.1.4 Building Type

- Retain the size of floor plates within the town centre
- Conserve and enhance the variety of storey heights
- Building entrances to face the public realm
- Conserve and enhance the town's character ie individual buildings grouped to form strong street frontages
- Buildings to extend to the rear of the public footpath. Buildings set back from the pavement edge must be fully substantiated in urban design terms and not detract from the overall street scene. The landscape treatment of any set back is to be of high quality
- Avoid excessive modelling of the street façade that may detract from the character of the overall street scene
- Buildings on street corners to present a continuous building line and
- Avoid excessive modelling of the roofline unless it is fully substantiated in urban design terms and does not detract from the overall street scene

9.1.5 Façade and Interface

- Conserve and enhance buildings and layout within the Conservation Area
- New developments or alterations to existing buildings to acknowledge the prevailing rhythm, pattern, appearance, proportion and materials of the historic building facades within the town
- Missing or under-developed street frontages to be repaired or in-filled with good quality replacements and

- Repair and reinstate boundary treatment to the street frontage

9.1.6 Flood Risk

- For sites where flood risk is an issue, ensure building design and layout have taken into consideration the need to ameliorate the impacts of possible flooding
- Design solutions such as raised floor levels, sufficient means of escape and refuge areas should be incorporated
- Lower vulnerability uses should be accommodated on ground floors and higher vulnerability uses on upper floors
- Development below ground level should be avoided

9.2 Details and Materials

9.2.1 External Walls

- The majority of buildings within Whitehaven town centre are constructed in local rubble sandstone with dressed stone openings. Render or harling has been applied to improve weather proofing and disguise alterations made to the façade. Smooth render or stucco is often “coursed” to imply a stone effect.
- Other buildings have been constructed of ashlar red sandstone which weathers badly in the maritime climate and local brick which was encouraged by the Lowthers to deter excessive rock quarrying and to make use of their own brickworks.
- New developments should be encouraged to be of their own time.

9.2.2 Roofs

- Roofs are typically dual pitch and constructed of Westmorland or Welsh slate which is flat in appearance and of a dark colour. Light or coloured materials such as red tiles should be avoided. Chimney assemblies are important historic features and make a substantial contribution to the town’s roofscape. They should be retained and, where appropriate, replaced.

9.2.3 Entrances

- Entrance doorways on the earliest buildings are simple square-headed affairs with stone surrounds, often set back into the property to accommodate steps. Over a period of time grander properties introduced elaborate classical portals, some with arched fanlights. Entrances to inner courtyards are carriage height. Timber doors should not be replaced in man-made materials.

9.2.4 Windows

- In early 17thC most buildings would have had small stone mullioned windows with hinged casements. These older window types were later replaced by sash and case

frames. The simply arranged repetitive window openings with vertically proportioned 6 pane casements set within a simply proportioned façade creates extremely harmonious elevations and is a main feature of Whitehaven's townscape. Earlier surrounds were simple, square headed arrangements but later examples introduced moulded surrounds and classically detailed sills and heads. Victorian facades adopted 2 pane casements but this maintained the vertical proportion and scale of the window openings. Timber sliding sash windows should be retained and repaired. Replacement windows and doors should be in timber and respect sliding sash profiles and opening mechanisms.

9.2.3 Ornamental Ironwork

- A significant amount of the town's ornate railings still remain and the delicate Georgian ironwork to entrances and basement wells contributes significantly to the town's character.

9.2.4 Colour

- The most successful use of colour tends to be warm, off white earth or neutral colours. Contrasting, slightly darker stone tones are best for architectural features such as stone dressings, bold primary colours are seldom successful as they tend to increase the visual bulk of a building and make a façade look overwhelming. Georgians often painted windows dark green, red or grained varnish, but it has become the norm to paint window frames white or off white and this should be continued across the town centre. On non domestic buildings alternative window colours may be acceptable when part of an overall colour scheme for an entire building. Black, rich dark or muted colours or grained varnish are generally appropriate for entrance doors.

9.3. Design Options for the Public Realm

Overall there is a need to unify the town centre, so that it is perceived as a coherent place, and to reinforce the distinctiveness of character areas within the town, so that the local sense of place is enhanced.

9.3.1 Unify the townscape: Respect the historic pattern

- Building Line
Buildings should respect the historic pattern of Whitehaven's townscape. Ensure building frontages and heights are aligned with neighbours. Recessed frontages may be used to signify special places and entrances, but street corners should be kept to the building line.

- Street Hierarchy
Street layout and proportion patterns should be reinforced, with building scale and street widths determined by the existing street hierarchy.
- Main Streets
Through streets which traverse the town centre should be surfaced consistently, thereby unifying the townscape. Other streets can differ, to reflect the local characteristics of the area.
- View corridors
The views along streets which are characteristic of Whitehaven should be respected. Streets should be de-cluttered and frontages and kerb lines should be aligned to enhance views.

9.3.2 Unify the townscape: Enhance the public realm

- Lighting Strategy
Lighting should reinforce orientation and therefore comprehension within the townscape at night. Street lighting levels should be kept low.
- Connections
Traffic currently dominates the one-way system. The integration of traffic calming devices and street de-cluttering to make pedestrian movement easier will result in better cross town connections.
- Woodland Setting
Enhance the woodland infrastructure which characterises the backdrop to Whitehaven town centre. Protection and enhancement of the existing woodland will increase biodiversity and environmental value, whilst maintaining the historic identity of Whitehaven.

9.3.3 Make distinctive places: enhance the public realm

- Character Areas
The distinctive character areas of Whitehaven's town centre should be maintained by following the existing prevailing pattern of the public realm.
- Distinctive Streets
Streets, side streets and lanes should be paved and laid out to reinforce the detailed local townscape. Clutter should be avoided.
- Gateways
The arrival points at the edges of the town should be improved, by introducing a co-ordinated approach to streetscape and buildings to enhance the sense of entrance, and to distinguish the town centre from surrounding districts.

- Better Local Connections 1
Walking routes between the town centre and nearby development sites such as Albion Square must be improved to ensure the benefit of the investment is maximised through the town.
- Better Connections 2
Encourage harbourside development which will improve connections between the harbour and the town, making easier pedestrian movement.
- Better Connections 3
Some shops lining King Street may have through alleys inserted between to improve permeability, and increase the shop display frontage.
- Tree Planting 1
Additional street trees should be avoided, but existing amenity spaces can be enhanced through tree planting.
- Tree Planting 2
Tree planting in co-ordinated lines, avenues and boulevards should be re-introduced to bring structure, order and consistency to the currently formless areas to the south east of the town centre. This would help to reinstate the former Georgian plantings, and extend the ordered grid to integrate with the cricket pitch.
- Courtyards
The character of courtyards and small pocket parks should be developed to create places of shade, shelter and texture. Additional to existing places of refuge and contemplation these will contribute to the quality of the street experience.
- De-clutter
Street furniture should be removed from streets where it causes clutter. Seats should be installed in specially designed amenity spaces, not in streets.

9.4 Options for Shopfront Design

The town has a number of attractive and historic shopping streets. The quality of the shopfronts and associated signage varies enormously. Successful examples tend to have a well proportioned shop front that has an architectural relationship to the building above and on either side. Where they exist, original shopfronts should be retained. If original shopfronts have been covered up they should be restored and brought back into use. It is not acceptable for “corporate” signage to overwhelm a shopfront on a historic building. Most high street shops now recognise the importance of a sensitively designed shopfront that reflects the quality of the building they choose to trade from. The creation of a strong identity for an individual shop is secondary to achieving an appropriate balance within the town’s street as a whole.

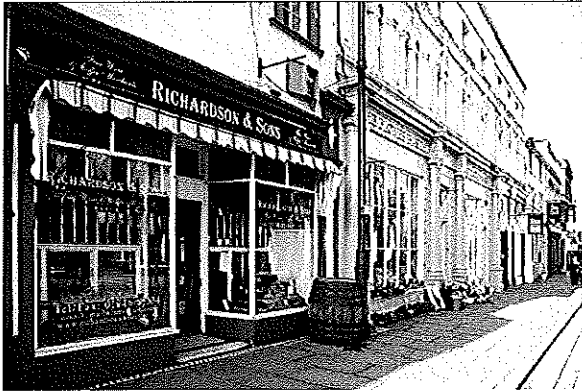


Figure 10 Shops on Lowther St

Colour schemes should clarify the architectural form of the frontage and should not merely apply alien treatments and designs. Most successful colour schemes employ only one or two colours. The use of several colours requires a careful balancing of elements which can be difficult to achieve. Dark colours generally work best for timber or aluminium shopfronts. Stone shopfronts should be left unpainted.

Lighting of shop signs should be discrete and not overpowering. Neon or back lit fluorescent box signs should not be used. Where security shutters are unavoidable they should be open grilles set behind glazing allowing shop displays to be visible out of trading hours. Traditional retractable awnings add interest to the street scene and protection from the elements.

9.4.1 Building clutter

In many cases, items including security alarms, satellite dishes, TV aerials, extract ventilation plant and grilles, meter enclosures and flood lighting have been added to principal street facades. It is essential that the installation of these components is controlled and their positioning handled sensitively and discreetly.

9.4.2 Principles

- Shopfronts should be of good quality, well proportioned and relate to the building above and to the side. They should also have an appropriate level of detail. There must be consideration of the proportions of signs, windows and fascia with respect to the vertical lines of the whole building and street. Designs should therefore seek to promote classical proportions to protect and enhance the local environmental quality.
- Wherever possible sensitive repair and restoration of existing heritage shop fronts and their components using traditional building techniques and materials is the preferred option.

9.4.3 Colour

- Where applied colour is used, adhere to the following:

- Use warm, buff earth colours on render
- Only use contrasting colours where there is an architectural justification (ie at quoins, window sills etc). The degree of contrast to be kept within a subtle range of warm-buff
- Window frames to be off-white
- Doors to be black, rich dark or muted colours or grained varnish
- Rainwater goods to be black
- Railings to be black or bronze green
- Use of paint should consider colour and shade (various companies have a “heritage range”) as well as the quality of the paint (silicate paints will last longer and weather better)

9.4.4 Materials

- Encourage the use of crafted building techniques in new developments
- Roofs should be low-key, slate and dark in colour
- Avoid building materials that are alien to the character of the town unless it is fully substantiated in urban design terms and does not detract from the overall street scene. Only high quality finishes and traditional materials should be used, with the majority of the shop front being of painted timber. Aluminium or other forms of metal framing are generally unacceptable, as is the use of plastic for fascias and other facings.
- Existing cast iron rainwater pipes and gutters should be retained and if possible repaired using new lengths, fittings and supports made from iron.

9.4.5 Security and Clutter

- Items such as security alarms, satellite dishes, extract vents and meter enclosures to be located out of view on secondary facades and;
- Security screens should be open grille type placed behind the glazing. External steel roller shutters are not appropriate in the context of the Conservation Area. Toughened glass should be used for security with the use of internal metal lattice grilles where there is no other practical solution. Demountable wrought iron or steel gates should be used to secure recessed doorways, as can be seen on a number of traditional shop fronts in the Conservation Area (existing gates must normally be preserved).

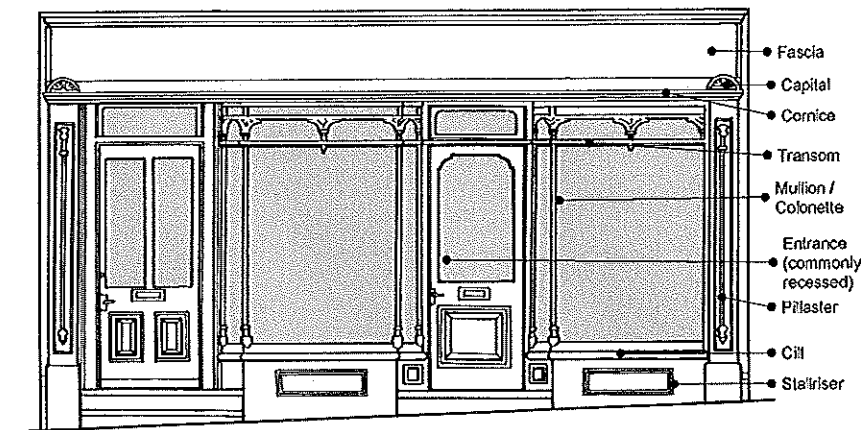
9.4.6 Signage

- Signage should relate closely to, and complement, the building. Unsympathetic standard corporate design is inappropriate for the town centre. Signage should be hand-painted onto fascias using lettering of a size and style which makes good use of the available space. Sign-writing on the window glass or etched signage are good

options if executed well. Lighting to signage should also be fully considered, avoiding low grade box signs. Internally illuminated fascias and projecting lamps should be avoided. External strip lighting concealed within the design of the fascia and internal display lighting may be acceptable if well designed. There should be no more than one projecting sign per shop front which, with the exception of pub signs, should be generally at fascia level.

9.4.7 Shop Windows

Figure 11 Elements of a Traditional Shop Front



- The shop window should not be one sheet of glass, and should be subdivided to maintain the verticality of proportion which is characteristic of the town. Recessed doorways can be used to add interest to the frontage. Doors flush with the frontage may not be acceptable.
- Fascias should have distinct mouldings and pilasters should seem to support the wide side of shop fronts.
- Where distinct buildings have been combined to form one shop, each building must have its own shop front. The same fascia must not be carried across the separate buildings, though the design of each frontage can be related.
- A stall riser, between the pavement and bottom of the shop window, should reflect the classical proportion of the front as a whole and serve to act as a “base” to the architecture above. Glazing that drops down to ground level is not acceptable.
- Aprons and blinds should be retractable, extend across the whole width of the fascia and be designed to be integral with the architecture.

- Corporate identity will need to be adapted to suit the context of the Conservation Area, as it has in many historic towns. Shop fronts within new buildings or which do not directly open onto the streets may be more flexible in their approach, though the above principles should always be followed.

Question 12(a): Do you agree with the Options for Design Guidance?

Question 12(b): Are there any other principles which you consider should be included?

10.0 Transport and Accessibility

Transport and accessibility are key issues for Whitehaven town centre. In general, accessibility issues that require addressing include:

- The poor standard of vehicular and pedestrian direction signing and consistency of highway treatment in terms of materials and street furniture.
- The efficiency with which visitors are directed to appropriate car parking areas and other effective driver information are essential tools to maintain the efficient operation of the highway network and to minimise unnecessary traffic circulation within the sensitive town centre area.
- There is a perception amongst businesses that parking in the town centre is inadequate but this is not borne out by recent studies undertaken as part of work to develop a parking strategy (JMP, 2008). The studies demonstrated that there is significant spare capacity across the town during a weekday and a Saturday with a maximum occupation of 52% in public off street spaces, although on street parking is better utilised with a maximum occupation of 78% during a weekday and 83% on a Saturday. However the pricing structure may need addressing in order for improved management of existing facilities as there is little or no differentiation between the charges levied for a particular length of stay in a designated short or long stay car park ie the charging structure is not suitable to influence parking behaviour.
- Lack of consistency in the standard of direction signing, lighting, surfacing elements and dropped kerbs along the main movement corridors.
- In general developers will be expected to provide financial incentives to assist with achieving aims to improve accessibility within the town centre, commensurate with the scale of the development.

10.1 Options for Improving Town Centre Accessibility

Cumbria CC has developed a range of proposals for improving transport and accessibility in Whitehaven town centre and harbour areas. The proposals aim to improve the environment for pedestrians and cyclists, to reduce the dominance of the private car, and to develop a new public transport interchange to encourage bus use.

Transport Interchange

A new transport interchange will be created off Bransty Row on land currently occupied by the Tesco petrol filling station. The proposed interchange will comprise:

- 3 bus stands and 2 bus layover areas
- Upgrading the station car park area
- A driver facility building (to be developed in a later phase)

The Interchange has been designed to accommodate a new rail station with additional car parking spaces, in order to support the site's possible future development as a park and ride facility.

Streetscapes Project

The Streetscapes project will enhance the environment around the town centre through a range of improvements to junctions and streets.

- *Albion Square* – The junction at the mini roundabout at New Town / Irish Street has been radically redesigned to link the proposed office development into the town centre. The proposals comprise public realm improvements and changing the traffic signals to improve cycle movement, and should result in a more attractive, landscaped junction.
- *Strand Street* – Strand Street is a busy one way street which acts as a barrier between the harbour and the town centre, and has the appearance and function of a service road. The proposal is to improve and uplift the street through improved design, soft landscaping and planting. The public realm will be “de-cluttered” by taking out controlled crossings, raising the road up to a single level, narrowing the carriageway to a single lane, and increasing the number of crossing places at desire lines through the provision of “courtesy crossings” (general zebra patterns in road paving, which are treated by drivers as zebra crossings). Strand Street will continue to have the same access function, providing the main vehicular access to development sites. The one way system will be retained.
- *Lowther Street* – Lowther Street will become a pedestrian dominated, single surfaced street, with the appearance of a pedestrianised street. There will be no restrictions on vehicle access and movement, but no bus access or on street parking. There will be upgraded bus stop provision nearby at Strand Street. Access will be provided for deliveries and taxis.
- *Duke Street / Church Street Area* – This area has been redesigned to provide additional on street parking, and improvements to footway paving and bus stops.

<p>Question 13(a): Do you agree with the Options for improving town centre accessibility? Question 13(b): Are there any other proposals which you think should be considered?</p>

10.2 Pedestrian Accessibility Issues

Most of Whitehaven's residential areas surrounding the town centre are poorly connected due to the surrounding hillsides, although the distances are not great. In the case of Mirehouse / Corkickle the route is level along the cyclepath, but this suffers from no defined route in the town centre; generally the quality of the link footpaths is poor, and there are

traffic barriers at a number of key road junctions. The "off road" routes are generally in a poor state of repair, unsigned, suffer from urban dereliction and are overgrown in woodland areas. These are not only important for residents but potentially offer a fantastic resource for visitors and tourists, providing many stunning vantage points over the harbour and town.

10.3 Options for improving Pedestrian Accessibility and the Footpath network:

- Improved surfacing, lighting, signage and maintenance along all the main strategic footpath routes shown on Map 8;
- Creation of a defined cycleway link from Coach Road, to the Wagonway, to the north of the rail station, to improve pedestrian / cycle links through the town
- New and improved signage (and possibly tourist map leaflets) to help orientation around the town centre and surrounding areas
- Provision of access for the less able bodied and wheelchair users wherever possible
- New and high quality seating / resting areas along the footpath network
- Use of public art to provide historical interpretation and visual interest at strategic points in particular at key viewpoints.

<p>Question 14: Do you agree with the Options for improving pedestrian accessibility? Are there any other proposals which you think should be considered?</p>
--

10.4 Issues for Cycling

Whitehaven is one of two starting points for the Sea to Sea (C2C) cycle route. Cycling is one of the fastest growing leisure pursuits in the country and the route attracts 15,000 users annually. Most cyclist visitors to Whitehaven arrive and leave almost immediately, and the route takes them out along Swingpump Lane and New Town, one of the busiest sections of road and one of the most rundown edges of the town centre. Currently there is no provision for secure long stay vehicle parking for either support vehicles or cycles. The C2C has an alternative start point in Workington that is currently being upgraded. Whitehaven also lies on two other cycle routes; the Hadrian's Cycleway, currently being developed from Ravenglass to the North East which enters from along the same southern corridor and leaves northwards, behind the rail station (an area also in need of upgrading) and the Reivers Cycle Route (the return route for the C2C).

All in all this presents a face of Whitehaven that is hardly likely to attract people to stop in the town, nor to come back for another visit. Cycling is also potentially an excellent way to improve links between the town centre and existing communities.

10.5 Options for Improving Cycling Provision

- Possible realignment of the C2C, to avoid Swingpump Lane / New Town and use the proposed link through the Playground to provide a much more attractive route; and a clear route through the harbour to the rail station and beyond.
- In addition cycle paths should be introduced on main access footpaths and key roads, to create a network of safe, cycle friendly routes to promote the use of the bike around the town as a whole.
- New facilities for cyclists including shower/toilet/washing facilities, bike and equipment hire, food and secure bike storage, should be provided at the transport interchange; with long stay vehicle parking, possibly at the South or North shore. Good quality cycle stands should be provided at strategic locations.

Question 15(a): Do you agree with the Options for improving provision for cyclists?

Question 15(b): Are there any other proposals which you think should be considered?

10.6 Car Parking related issues

Town centre car parking is currently focussed on the multi-storey and two surface car parks accessed from Swingpump Lane. Car parks associated with the various supermarkets also cater for shoppers who visit the town centre.

A need for additional parking to serve existing business use within the town has been identified through the consultation process, but this is not borne out by recent studies, so there may be a need to increase awareness of existing facilities through the use of improved signage and promotion of the different parking locations. Additionally a lack of parking for residential properties within the town centre, has been identified. The current “on street parking” is time restricted to 1 hour, with residents exempt, Monday to Saturday 8am – 6.30pm.

10.7 Options for improving car parking

Any further significant residential developments will be required to either provide appropriate levels within the development, or contribute to communal parking, such as an extension to the multi-storey.

Proposals also include additional parking attached to the existing multi storey car park on Swingpump Lane which could be segregated from the existing parking within the building.

Question 16(a): Do you agree with the Options for improving car parking in the town centre?

Question 16(b): Are there any other proposals which you think should be considered?

11.0 The Way Forward, SPD Process and Timescales

The Town Centre SPD preparation and adoption should run concurrently with the Planning Contributions Framework SPD, and link closely to work on the Submission Core Strategy and the emerging Copeland Plan, the proposed sustainable community strategy. There will be opportunities to run joint consultation exercises to maximise public engagement in the documents and to co-ordinate work to address any overlapping or conflicting issues.

Key Stages	Proposed Dates
LDF WP Report for information / approval setting out proposed process for SPD	April / May 2011 (Completed)
Inform key stakeholders / Notice of Intention to Prepare SPD	May / June 2011 (Completed)
Prepare Issues and Options	Summer 2011 (Completed)
LDF WP Approval for Issues and Options	September 2011 LDF to approve Sept
Consult on Issues and Options (6 weeks)	October - November 2011
Prepare Draft SPD for Consultation	November 2011 – February 2012
LDF WP Approval for Draft SPD	March 2012
Consult on Draft SPD (6 weeks)	March – April 2012 (LDS advises Jan – Feb 2012 Consultation for SPD (not Regulation 25))
Finalise SPD	May – August 2012
Council Approval / Adoption of SPD	Autumn / Winter 2012 (LDS advises August 2012 for publication / adoption)
Publish Final Version of SPD	Winter 2012

12.0 Bibliography

A Vision for Whitehaven, Frederick Gibberd Ptnership for Whitehaven Development Company (undated)

Whitehaven Town Centre Small Business Strategy Final Report, Chesterton Plc, 1999

Whitehaven Town Centre Development Framework, Broadway Malyan, 2006

Whitehaven Regeneration Programme Implementation Plan, White Young Green (for West Lakes Renaissance), 2007

Strategic Flood Risk Assessment, JE Jacobs, 2007

Whitehaven Car Parking Strategy, JMP Consultants Ltd, 2008

Whitehaven Town Centre and High Street Conservation Areas Character Appraisal and Management Plan, Whitehaven Town Centre Development Guide and Whitehaven Town Centre Public Realm Appraisal, Paul Butler Assocs, 2009

Extensive Urban Survey, Archaeological Assessment and Strategy Report for Whitehaven, Cumbria County Council and English Heritage (undated)

Cumbria Historic Landscape Characterisation, Cumbria County Council, 2009

Copeland Local Plan 2001 - 2016, Copeland Borough Council 2001

Copeland Core Strategy and Development Management Policies Preferred Options, 2010

Internet sources

"Living Conditions in 19th Century Whitehaven", <http://ww.cultrans.com/whitehaven.html>

"Images of Cumbria – Whitehaven",
http://www.stevebulman.f9.co.uk/cumbria/whitehaven_f.html

Appendix 1

Informal Public Consultation on Issues and Options

Consultation Responses

Whitehaven Town Centre and Harbourside SPD

Issues and Options Consultation

Copeland Disability Forum 7/06/2011

Comments	CBC response
1. Concern that the proposed extension to the town centre boundary will have implications for existing residents parking i.e. Coach Road.	Para 5.6
2. May 'blight' some town centre properties by permitting relocation on the former edge.	Para 5.6
3. Abuse of accessible parking generally in the town – on and off street but accept that this is a national issue. Would like to see all on street accessible bays time in Whitehaven restricted to 3 hours as opposed to all day to reduce the benefit to constant abusers who tend to hog them for whole day periods.	Para 5.2
4. Generally there is a lack of adequate dedicated accessible parking in the town.	Para 5.2
5. Any new development must comply with the requirements of the Equality Act 2010.	Noted
6. Link from town to harbourside – regarding the proposed shared surface and loss of any formal crossing points. Have concerns over the potential conflict of use between the car and users with disabilities particularly for people who are blind or partially sighted and have hearing impairments. Significant issue.	Para 5.2
7. Lack of dropped kerbs near Zest on the Harbour. Has been raised with the Harbour Commission but still outstanding. Access in this area as a result restrictive.	Para 5.2
8. Lack of suitable accessible signage in the town centre do have heritage signs but these are not easy to read / accessible to all users.	Para 5.2

<p>9. Floorscape – important, need adequate dropped kerbs/corresponding contrast tactile surfacing in the right locations. Cobbles should be removed as surfaces need to be flush and all drainage channels need to be flush not dish.</p>	<p>Para 5.2</p>
<p>10. Public Seating – specific poor seating in front of civic hall/ library – not accessible at all concern that our comments re this scheme were disregarded.</p>	<p>Para 5.2</p>
<p>11. Lack of accessible wc's – poor provision in the town need a public facility at the interchange / Tesco end of town as opposed to James Street where the only public facility is. Has been a key issue with the group for many years!</p>	<p>Para 5.4</p>
<p>12. Access to shops etc generally requires improving.</p>	<p>Para 5.2</p>
<p>13. `Get rid of all bollards` – unnecessary street clutter and restrictive generally to access in the town. Raised in a separate response on the subject of street clutter with the Highway Authority. A-boards also raised as an issue to them. See attached document on `Street Clutter` for further information.</p>	<p>Para 5.2</p>
<p>14. Wheely Bins – large commercial ones on Strand Street are a particular problem affecting access to dedicated parking and pedestrian routes here. Raised as an issue via the Streetscapes Project and in our Street Clutter document.</p>	<p>Para 5.2</p>
<p>15. Shop Front Scheme – if one is introduced for the town need to ensure that a condition of any grant aid offered requires the scheme to be reasonably accessible.</p>	<p>Para 5.2</p>
<p>16. Public Transport – on the whole this is still relatively inaccessible. Note there is some token provision i.e the odd bus stop is raised and as regards buses themselves it's often the case that where they are provided on routes drivers won't actually lower the ramp to enable access and egress - this is an ongoing issue with the bus company concerned!!</p>	<p>Para 5.2</p>
<p>Key Sites for Development (Development Opportunity Sites) raises the following concerns: 1) Quay Street – if this is developed it will lead significant loss of accessible parking in the town as this site is one of the few which provides good accessible parking for the public and is well used.</p>	<p>8.2.1 SWOT Analysis of</p>

<p>It would be a shame to lose this facility. Would like to see this level and form of parking provided elsewhere if this site is lost to development?</p>	<p>Quay Street Car Park</p> <p>8.3.4 SWOT Analysis of Gough's Car Park</p>
<p>2) Gough's Car Park, rear New Lowther Street --- if this is developed need to ensure rear accessible access to the solicitors and dedicated accessible parking is protected.</p>	

Whitehaven TC&H SPD - Issues and Options Public Consultation

Young Peoples' Comments / Exhibition Content, July 2011

Whitehaven High School

Comments	CBC Response
Graffiti makes our town look horrible and run down	Paras 5.1 and 5.4
The buildings show some of Whitehaven's history	Para 5.1
The town is decorated by its heritage	Para 5.1
Shops need to smarten up	Paras 5.1 and 5.4
The town is filled with different themed buildings	Para 5.1
Many buildings are in decline	Para 5.1
Industry is declining in tourist areas	Para 5.3
Roads and footpaths are in decline	Para 5.2
Bins need emptying more regularly	Para 5.4
Shops are beginning to make an effort	Para 5.3
The town is well decorated all year round	Para 5.2
Some signs are clearly labelled	Para 5.2
There are plenty of bins	Para 5.4
There are specialist buildings and shops	Para 5.3
The town is being redeveloped	Para 5.4
There are established tourist facilities	Para 5.4
New buildings should match the town's heritage	Para 5.1
Our harbour needs to be cleaned up more often	Para 5.4
The harbour is dirty and an eyesore	Para 5.4
Our town is only cleaned up for special events	Para 5.4
There are too many deserted buildings	Para 5.1
The town isn't well signposted	Para 5.2
Sign posts are not clear	Para 5.2
The town doesn't market the vast amount of listed buildings	Para 5.1
Listed Georgian buildings v Modern Buildings on harbour	Para 5.1

Many buildings in decline (James St/Market Place)	Para 5.1
Conservation Area doesn't cover full town boundaries	A Conservation Area is a designated area of special architectural and /or historical interest, the character or appearance of which it is desirable to preserve or enhance. The town centre boundary extends beyond the Conservation Area to include areas of little or no historic interest.
Listed building (off Basket Rd) ignored	Listed building status will give protection to buildings of historic or architectural importance outside the town centre boundary.
Empty sites away from main town	There are a number of vacant sites on the periphery of the town centre and these are identified in the Local Plan, Core Strategy and SPD Issues and Options document.

Youth Forum / Youth Groups

St Nicholas looks really good and the gardens are well looked after. The church by the Civic Hall looks untidy at the moment; it should be developed so everyone can enjoy.	The former Methodist church is identified as a development opportunity under para 8.6
(Area in front of Post Office, Lowther St) This area could be made better. There could be some seats, some artwork or flowers, at the moment it's wasted space.	The County Council Streetscene project includes a proposal for environmental improvements on Lowther Street.
I like how the shopping area is only for people and no cars are allowed, but it is divided by a busy road, it would be good if it was all together	The County Council Streetscene project includes a proposal for environmental improvements on Lowther Street.
Too many shops are closing down in Whitehaven. The empty shops make the shopping area look untidy.	Para 5.3
Empty shops should be developed or the shop fronts should be made nicer to look at while they are empty. This would make other businesses come to Whitehaven.	Para 5.3
There are too many charity shops in town. Other shops need to be attracted to Whitehaven, like Sports and Music shops and Primark.	Para 5.3
We need to develop and look after older buildings	Para 5.1

Things like this (pebble sculpture / street art) make the town look good and are important to make the town more (attractive?)	Para 5.4
Some everyday things should be made better, the bus stops in town look untidy and these should be changed to fit in with how the town looks.	Para 5.4
Older buildings need to be looked after as they are important to Whitehaven's history and look good	Para 5.1
There should be fewer ugly buildings, these let Whitehaven down	Para 5.1
There aren't enough signs around town so people know where things are. These should be like the black ones though as they look better and suit the town	Para 5.2
Empty spaces should be developed, most have been left and are now overgrown and look really untidy. The area next to the vets would be good as a skate park.	Para 5.1
The hub is really good; there should be more things like this in the town. We should also make sure these are looked after and painted regularly.	Paras 5.1 and 5.4
There should be seats by the harbour gates, people like to watch the boats coming in. This would be good for people who live in Whitehaven and visitors.	Para 5.4
Some of the things that have been added to the harbour recently are interesting to look at but they need to be looked after. Lots of the fish along the walkway are missing and this doesn't look good. The whole area needs to be looked after better and more should be made of the C2C starting point. The harbour is a really attractive part of Whitehaven and the walkway along should be looked after. It should be repaired with bricks so it is the same colour.	Para 5.4
The harbour is a great part of town but it is separated from the rest by a really busy road and untidy streets to get there. This should be changed, it would be better if the shops were better connected to the harbour.	The County Council Streetscene project includes proposals for traffic calming on Strand Street. Para 5.2
There needs to be sign posts so people know where to go.	Para 5.2
There should be more information around Whitehaven about its history	Para 5.4
We need to make sure the history in Whitehaven is protected and that people can get to enjoy it.	Para 5.4

Bransty School

Liam Wardle and Gregor Fraser propose to make a change to the town's old bus station. We are making a shop in town. It is the old bus station. We are trying to persuade you to let us	Para 8.3.3
--	------------

<p>build a BMX track in there. We can get kids in and then it will keep kids off the street and stop them being in trouble all the time.</p> <p>We will be making a paint ball room upstairs so it will be fun as well. You have to hit the highest score to move up a grade their gun from a pistol paint ball gun to a shot gun paint ball gun or a machine gun.</p> <p>Please consider our proposal.</p>	
<p>Sam Shimmin and Ce-Jay Irvine propose a change in use to the Bransty Arch Bus Station. We propose to change the bus station to incorporate 2 levels.</p> <p>Ground Floor</p> <p>The bar will serve alcohol. Tables and chairs where customers can enjoy a quiet drink. A pool table and arcade games will be available to entertain customers. Most of the floor will be used to contain a laser quest for children over 8 years.</p> <p>Top Floor</p> <p>On the top floor is JJB, it will sell clothes and shoes for children and adults. There will be a massive window so you can see the clothes from outside.</p> <p>There are going to be toilets available on this floor.</p>	<p>Para 8.3.3</p>
<p>Leah Sim and Iain Jay Fowler propose to build a toy shop and an Aquarium in the current derelict bus station.</p> <p>We need to build an extra floor to house the visitor attraction an aquarium. We hope to bring exotic and unusual fish to the county to encourage local children to be more knowledgeable about these species.</p> <p>Toilets will be built for customers to use a separate room will be used to inform visitors about the aquarium.</p> <p>However floor will house a specialised toy store.</p> <p>Access to the upper floor will be by an escalator.</p> <p>Open 12 till 9 daily.</p>	<p>Para 8.3.3</p>
<p>Bethany Mills and Briony Bennett propose to develop the Bus station into Cumbria's only PRIMARK store.</p> <p>The store will be based on two levels.</p> <p>The Ground floor will sell clothes half of this floor will be dedicated to Boys/Men and the other half to Girls/Ladies.</p> <p>Changing rooms will be available for customers to try on potential purchases.</p> <p>The first floor will have toilets available for customers.</p>	<p>Para 8.3.3</p>

<p>A café will be built with plenty of seating customers. It will sell hot-cold beverages as well home cooked food, sandwiches and paninis. Early shoppers can make the most of the cooked breakfast which will be offered until 10 o'clock. Opening times: Mon to Fri 8am – 5pm Sat 9am – 7pm Sun CLOSED</p>	
<p>Para 8.3.3</p>	<p>Daniel Counsel and Alexander Gair propose a change in use to the Bus Station. We will utilise the space. We are planning to build a Red Bull Dirt Park. We hope to attract anyone aged 6 years and above. They will need to provide their own bike and appropriate safety equipment. The course will include a virtual fire jump, a spine and a quarter pipe. Ramps will be varying heights to challenge even the most able rider. We plan to hold special events to showcase the local talent. Free to the public. Open day and night. Security cameras will be installed to monitor users. Any misuse will be reported to the police.</p>
<p>Para 8.3.3</p>	<p>Matthew Jackson and Declan Clark propose a change in use to the bus station. We would like to change it into a commercial property to a fishing tackle shop called "The Perfect Catch". Another floor will need to be added. Main floor will allow customers to try out rods and practice their casting. The majority of the floor will consist of a large open salt water tank which will contain a large number of salt water fish. A staircase to access different fishing points around the tank. A wave machine will ensure a realistic experience. The upper floor will be accessed by a staircase. A large variety of different sized rods will be available to purchase. Different sized reels and thickness of lines will also be available. Live bait to include lug worms, meal worms, sand eels, razor fish and rag worms. Joseph Johnson and Reece Bell propose changes to the bus station. We require two floors to house our potential bowling alleys and laser quest. A staircase and a lift will allow easy access to both floors.</p>
<p>Para 8.3.3</p>	

<p>Ground floor will mainly consist of a newly built up to date gadget filled Laser Quest. Customers are ensured of a memorable experience. Part of this floor will also include a snack bar which will sell hot and cold food as well as soft drinks.</p> <p>Upper floor will be transformed into a family fun filled ten pin bowling club.</p> <p>We propose building 7 alleys which will have up to date fixtures. One of these will be reserved for families.</p> <p>A bar area will allow customers to purchase alcoholic beverages. A comfortable seating area will allow customers to view the beautiful Whitehaven Harbour and the Solway Sea. A pool table will be available to entertain if required.</p> <p>Toilets will be available for customers to use including a disabled toilet.</p> <p>Opening times: Daily MIDDAY to Midnight.</p>	<p>Para 8.3.3</p>
<p>Jake Diamond and Lewis Scott Atkinson propose changes to the use of the bus station in Whitehaven.</p> <p>Initially a new floor will be built with partition wall to split this floor in two.</p> <p>Ground Floor: A skate park for adults and children to use. Bikes and skate board will be allowed and equipment will be available for customers to buy or hire appropriate safety equipment.</p> <p>Top floor: An arcade to include machines, a virtual paintball area, a laser flame thrower run, bowling lanes and a go-kart track.</p> <p>The Wall Bar will be relaxing area for families.</p> <p>Food will also be available. A pool table will be free to customers.</p> <p>A separate doorway will be made to access the top floor.</p>	<p>Para 8.3.3</p>
<p>Kaycee Connelly and Owen Cunningham propose changes to the bus station.</p> <p>We would like to add an extra floor to utilise the space available.</p> <p>The ground floor will include a café bar. A soft play area will be built inside the bar area to encourage families to use the café bar. A comfortable seating area for customers to relax with a hot or cold drink a vending machine containing a variety of snacks will also be available.</p> <p>The ground floor will also house the reception area for the hotel.</p> <p>A lift will be installed for easy access to the first floor.</p> <p>The first floor will be transformed into a family friendly hotel. All rooms will be furnished to a high standard.</p> <p>A gym will be available for hotel guests only. Trained instructors will be employed to give guests a high standard of service.</p>	<p>Para 8.3.3</p>
<p>Amy Youdale and Caitlin Pickering propose a change in use to the Bransty Arch bus station.</p>	<p>Para 8.3.3</p>

<p>Another floor will need to be built.</p> <p>Ground floor</p> <p>A number of different slot machine and shooting games will make up this arcade. There will be a bar area which will sell alcoholic and soft drinks. A seating area so customers can relax. 2 escalators will be installed so customers can access the upper floor.</p> <p>Upper floor</p> <p>A number of stalls to get your 10p and 2p change or a vending machine. A ticket shop to get toys. Two toilets at the side / boys and girls.</p> <p>Opening times Mon/Sun 8am/5pm</p> <p>Late night Friday / Sunday 8.00</p>	
<p>Jamie Brown and Aaron Chambers propose a change in use to the Bransty Arch bus station. We will require two levels to house Cumbria's only Primark</p> <p>Ground floor</p> <p>Half of the ground floor will house girls/ladies fashions and the other side for boys/men fashion.</p> <p>First floor</p> <p>A café will be built to serve customers hot and cold food and beverages.</p> <p>A comfortable seating area where shoppers can rest their weary feet.</p> <p>The homeware will be set up and accessible from both floors.</p> <p>Opening times Monday to Thursday 9.30 to 8.00 Saturday and Sunday 9.00 to 6.00</p> <p>Please consider our ideas carefully.</p>	<p>Para 8.3.3</p>

Valley Primary School

<p>We could see the pretty hills in the background but we did not like the multi storey car park. It was an eye-sore and it blocked our view.</p>	<p>Paras 8.4.1 and 8.4.2</p>
<p>(Car park off West Strand?) We felt this was a wasted car parking space and thought it could be used for a play park if Mark House is not suitable. It felt more sheltered because of the wall behind and we like the fact that we could see the candlestick.</p>	<p>Para 5.4</p>

<p>We were happy to see this beautiful, living, breathing fish, unfortunately it was amongst all the rubbish and pollution in this water.</p>	<p>Para 5.4</p>
<p>We think that littering should stop because it might harm the fish in the harbour or other wildlife. It looks disgusting and smells horrible. Once it has been cleaned up we need more bins, CCTV cameras, more officers to patrol, as well as visual signs to show people how we do want our harbour to look.</p>	<p>Para 5.4</p>
<p>This lovely area could be made into a beautiful clean beach if you clean the sand, import more to make it a terrific place to chill out for families – like below.</p>	<p>Para 5.4</p>
<p>(Mark House) This building is disgraceful and should be knocked down. We think it should be turned into a maritime theme play park with pirate ships, swings, lookout climbing frames, coal mining carts and a manmade coal mine for children to play on. This would reflect Whitehaven's history.</p>	<p>Para 5.4 and 8.3.1</p>
<p>(Inner Harbour Wall) It isn't very safe because there aren't any railings so it will be difficult for people in wheelchairs, the elderly or pushchairs. The surface is really uneven to walk on. It needs to be resurfaced and proper safe barriers around the edge.</p>	<p>Para 5.2</p>
<p>(Kerb) I don't like this picture because I am a wheelchair user and I have great difficulty getting over kerbs like this. Whitehaven needs to make the kerbs lower and we need more low kerbs. It is not just me who struggles; people with prams, mobility scooters, people with walking sticks and other wheelchair users. It would make a massive difference if Whitehaven could sort out this problem because it is a huge problem.</p>	<p>Para 5.2</p>
<p>(YWCA) We thought this was a smart building but were disappointed to see that it was vacant. We think it should be turned into accommodation for the senior citizens of Whitehaven. They would have a lovely view of the harbour when looking out of their window.</p>	<p>Para 8.6</p>
<p>We hope you take our ideas seriously and look at our ideas for a play park on the harbour. Thank you Valley Primary School</p>	<p>The ideas put forward have been considered as part of the development of the Issues and Options document.</p>

Whitehaven TC&H SPD

Issues and Options Public Consultation

Drop In Events – Pop Up Shop, Market Place, 23rd & 28th July 2011

Copeland BC Staff events – Tuesday Talkabout 26th July 2011

Comments Forms

Comments	Contact Details	CBC Response
The Auction Mart in Preston Street should be made into a Park albeit a temporary one that could be quickly re-used into an industrial area. The wooded area behind Kwik Fit should be tidied up and made more appealing to the eye.	P Priestley 3 Crow Park Whitehaven CA28 7SF	Paras 8.5.2 and 8.5.3 SWOT Analysis of WEO3 & WEO4
Proposed structure for flats on harbour does not "fit in". Would be a shame to miss a chance to blend into the town instead of cheap flats – got the best view of the harbour. Market "managed" more professionally rather than bullied and enforced like traffic wardens. Market has been here for 150 years and has been destroyed in last 2 years. Would like to see a 7 day market.	Dave Johnson 6 Hillcrest Avenue Whitehaven softman@live.co.uk	Paras 8.3.1 SWOT Analysis of WTC2 and para 4.3
Don't mind Albion Square – anything an improvement there but Harbourside development should be in keeping with Georgian Town.	Mrs Tucker 15 Harris Road Mirehouse Whitehaven	Paras 8.4.1 and 8.4.2 SWOT Analysis of WTC2
I like the Beacon and a couple of shops but there is a lot of rubbish especially in the harbour.	Lauren Kirkup (aged 10) 6 Foxhouses Road Whitehaven CA28 8AF	Para 5.4
More seaside-like shops on the harbour. More in-keeping development on the sea front. Better links between the	Stephen Kirkup 6 Foxhouses Road	Para 5.4 Para 5.2

<p>harbour and town centre, which currently seem to turn their backs on each other. Can anything be done about Whitehaven being a huge one-way roundabout.</p>	<p>Whitehaven Stephen@kirkup.info</p>	
<p>General Design Overview – Whitehaven’s attractive qualities are the Georgian architecture’s crowded streets and the contrast with open space of the harbour, clifftops and parks. Too many styles will dilute the contrast and distinctiveness and disorientate the visitor and erode the town’s character. New developments should at least not exceed the height of existing buildings and preferably not break the connection between the old town and the harbour. The town is quite crowded, a harbourside open space would be most welcome.</p>	<p>Chris Gomersall 5 Rheda Terrace Cleator Moor CA25 5JE 01946 815910 chrisandfrogsonbike@hotmail.com</p>	<p>Para 9.1</p>
<p>General Developments – A harbourside rooftop café, bar, bistro would be nice, to eat, drink and dance overlooking the harbour. Light and airy development to make the most of the stunning setting and dramatic skies. There are no out door drinking, eating areas other than Anna’s which is often closed so if you want to spend time on an evening in the harbour it’s pretty much impossible.</p>		<p>Para 5.4</p>
<p>Mark House Development – To boost Whitehaven’s tourism offer there needs to be a range of activities. There are plenty of shops, offices and apartments are not attractive to tourists. As there is no decent sandy beach here the old swimming baths could be kept and expanded into a Lido on the harbourside, perhaps with a glass frontage to keep the wind off and maintain the view. It is an ideal location for a permanent market area which links town centre shops with the harbour and leisure opportunities. A permanent outdoor market area would help preserve Whitehaven’s market town heritage and allow a dedicated space rather than congesting the town’s streets.</p>		<p>Para 5.4</p>

<p>Albion Square development – looks like a factory. I would question the demand for office space. Surely any new offices should be near the transport hub to help avoid further traffic congestion. Offices and apartments should be side by side to make them most attractive to workers and companies as the current housing stock can be a deterrent.</p> <p>YMCA – Another character building this is an ideal opportunity to create a starting point for C2C cyclists. Having done the route 3 times I am aware of the difficulty finding somewhere to stay in Whitehaven. There is a large B&B commonly used at Lowca and campsite at St Bees but neither are ideal as you have to travel an extra distance to the start or miss some of the route.</p> <p>Methodist Church – Would make an ideal climbing wall development. Somewhere for Lake District climbers to go when the weather is too bad and an attraction through the winter season. Many churches have been used in this way in Manchester and London etc.</p> <p>Goughs Car Park – beer garden / park opposite Vagabond and Irish Bar to add a new dimension to the evening's entertainment.</p> <p>North Shore – Import sand and trap it here to give Whitehaven a decent beach for tourists to enjoy.</p>		<p>Paras 8.4.1 and 8.4.2 SWOT Analysis of WTC8</p> <p>Para 8.3.3 SWOT Analysis of YMCA</p> <p>Para 5.4</p> <p>Para 8.3.4 SWOT Analysis</p> <p>Para 5.4</p>
<p>Playpark on the harbour</p>	<p>Anon.</p>	<p>Para 5.4</p>
<p>Don't understand why new buildings can't be designed to fit with the character of the town, rather than the proposals for Albion square and harbourside flats for example.</p>	<p>Anon.</p>	<p>Para 9.1</p>

<p>The new brick built building on the harbourside is a good example of a new building that fits the surroundings.</p> <p>Albion Sq design is wrong in the context of its location. But above all this needs to be sorted out quickly. Re-development in Whitehaven generally takes far too long leading to missed opportunities eg Asda.</p>	<p>Anon.</p>	<p>Para 9.1</p>
<p>Refer to Keith Parker – Mt Pleasant lighting Wheelhouse Duke Pit – Candle Stick – after midnight, stays on till 5 in the morning.</p>	<p>Anon.</p>	<p>Referred to Keith Parker on 5/8/11 by email</p>
<p>Proposal for Albion Square needs to include sufficient additional parking for building occupants and visitors.</p>	<p>Signed but signature illegible</p>	<p>Paras 8.4.1 and 8.4.2 SWOT Analysis for Albion St sites</p>
<ul style="list-style-type: none"> • How does the “Vision” for Whitehaven knit together – preserving heritage, improving retail offer, Albion, Hotel, Powbeck? • Is there an overall plan? • To the general public it may look confusing. • What can we do to show the public what is possible for Whitehaven. Looking at towns like Falmouth and other coastal towns. • Who will take forward Townscape Heritage Initiative? 	<p>Rachel Graham r_graham10@hotmail.com (comments provided at Copeland BC staff session)</p>	<p>Replied by email on 5/8/11</p> <p>Thanks for your comments / queries. In response to your various points: The process for developing the SPD will include agreeing on a Vision for the document. This should reflect earlier ideas for Visions for the town and the Issues and Options document will look more closely at these. The Core Strategy provides the overall planning framework for the town / Copeland outside the National Park. The Issues and Options work may appear rather confusing at this stage but hopefully the document should appear more coherent when it is published for comments in Sept/Oct. From that document,</p>

		<p>the planning / design policies will be firmed up in the Draft SPD which will be published for consultation in early 2012. Education and awareness raising including considering successful projects elsewhere, is part of wider regeneration work. Local planning documents have to reflect national planning policy as well as local stakeholders' opinions, and also may draw on relevant examples of planning and regeneration undertaken in other parts of the country. The THI is being led by Julie Betteridge, and the pre-submission and Stage 1 Bid is being prepared by North of England Civic Trust (NECT) with support from Tony Pomfret, Simon Blacker, Don Taylor and myself.</p>
<p>Guest accommodation – bring in a consultant (Alex Polizzi) to work with the current owners and bring up the standard. Work with what we have in the first instance to encourage more tourism.</p> <p>Shops – customer service is very poor in both the national and private owner outlets. A Mary Portas type consultant would help. Shops may say they don't need help but they most certainly do. Gift wrapping offer would make a world of difference in some outlets. Working with what we have can</p>	<p>Paula Ratcliffe paularatcliffe@copeland.gov.uk</p>	<p>Refer comments to Economic Development Unit.</p> <p>Para 5.4</p> <p>Para 5.3</p>

raise from within.

Post It Notes

Accessibility

Comments	CBC Response
Concerns about Albion Square traffic and parking	Paras 5.2 and 8.4.1 and 8.4.2 SWOT of WTC8 & WTC9
Albion Square – design and location wrong – should be on Preston St ref Asda Project	Paras 8.4.1 and 8.4.2 SWOT of WTC8 & WTC9
Transport Interchange / new Bus Depot – needs a building – no proper shelter	Para 5.2
Parking – poor signage – not clear directions, particularly long stay	Para 5.2
Toilets near Harbour needed	Para 5.4
Area needs tidying up and cleaning	Para 5.4
Albion Square – poor design	Paras 8.4.1 and 8.4.2 SWOT of WTC8 & WTC9
Roads – better links to M6 needed – south	Para 5.2

Tourism and Leisure

Comments	CBC Response
Quay Street Car Park – really useful – a good location and used for Festival	Para 8.2.1 SWOT Analysis of WTC1
Whitehaven closes at 5.30pm – 6pm. Not much to do in evening for visitors / residents. Needs cafes, chandlers – mail order taken over because no choice.	Para 5.4
Sailing – good thing harbour in middle of town – potential. Maryport etc usually out of town. Access good. Lock – safe even in storms. Lock gates – good access. Bus transport slow but good – only 15 mins more than train – fast buses now to Carlisle.	Para 5.4 Para 5.3

Council needs to do more to attract more businesses – too many shops closing.	Para 5.4
Indoor market area could be used.	Para 5.3
Nothing for kids – 10 pin bowling	Para 5.4
Too many empty shops – puts visitors off.	Para 5.3
Lowther House – could have been a museum – better than Beacon.	The Beacon is a purpose built high quality interactive museum and is in an ideal location overlooking the town and harbour areas.
Beacon needs signs – Charter for Armed Forces. Should be free.	Lowther House – unidentifiable on GIS Para 5.2

Historic Environment

Comments	CBC Response
New development should be in keeping with Georgian architecture	Para 5.1
Albion Square and Harbourside out of keeping with Georgian town – monstrosities	Para 5.1
Shouldn't keep to Georgian architecture – build new designs. Don't stand still – move forward.	Para 5.1
Albion Square – why bring back “dark satanic mills”?	Para 5.1
New flats – not let – too much development. Shops and flats empty all over the country. Decent hotel needed.	Para 5.4

Local Economy

Comments	CBC Response
Small retail units for start ups	Para 5.3 Para 5.4

Whitehaven Town Centre and Harbourside SPD

Issues and Options Consultation

Business and Councillor Consultation Event 9th August 2011

Historic Environment

Q1 How can we protect historic landmarks and views?

Comments	Copeland BC Response
Orange Group	
<ul style="list-style-type: none"> Need to identify historic landmarks Multi Storey car park shouldn't be protected – should be improved. Needs to be more user friendly. Underused because so alienating. Vertical planting to soften it. Book ends of streets – important part of Georgian heritage. Chattanooga needs improving, YMCA etc 	<p>Landmarks identified in Conservation Area Appraisal but should be mapped for SPD</p> <p>Some improvements have already been undertaken and more are proposed as part of the Albion Sq scheme</p> <p>Incorporated into para 5.1</p>
Pink Group	
<ul style="list-style-type: none"> Roads – not built to accommodate big lorries etc, town built for horse and cart 	<p>Noted. Streetscapes project should improve traffic management</p>
Green Group	
<ul style="list-style-type: none"> EH advise that buildings should be “of their time” but need to get quality into it Height is key – Pears House – 1 storey too high – destroyed view from Bransty Identify landmarks and vistas – urban design analysis of time and say which vistas need to protect – could involve restricting building height Height – may tolerate higher buildings around fringes 	<p>Included in para 5.1</p> <p>SPD will provide guidance on height and massing</p> <p>Identified in Conservation Area Appraisal but should be mapped in SPD.</p> <p>Noted – SPD will provide guidance on height and massing.</p>
White Group	
<ul style="list-style-type: none"> Lottery funding – too many hoops, and Legal processes – too lengthy eg for enforcement 	<p>Noted.</p>

Q2 How can new development be successfully accommodated within the historic environment?

Comments	Copeland BC response
Orange Group	
<ul style="list-style-type: none"> Recently extended Conservation Area helps – more control over development should help 	Noted.
<ul style="list-style-type: none"> Rooflines and proportions very important – don't want skyscrapers. 	Incorporated into para 5.1
<ul style="list-style-type: none"> Not big blocks, not single blocks 	SPD will encourage a collection of forms rather than a single mass
<ul style="list-style-type: none"> Need new architecture as long as high standard 	Para 5.1
Pink Group	
<ul style="list-style-type: none"> Tax office – generally liked. 	Noted but Conservation Area Appraisal notes (Development Guide, p38) that the overall effect of the building is of another age and is somewhat alien to the building tradition of the town centre.
<ul style="list-style-type: none"> Eyesore buildings eg police station – impact on town centre 	Noted
<ul style="list-style-type: none"> Pears House – looks like pigeon lofts at the top 	Noted
<ul style="list-style-type: none"> Mark House – awful 	Noted
<ul style="list-style-type: none"> Quality of materials very important 	SPD will provide more detailed guidance on materials and will promote high quality
<ul style="list-style-type: none"> Do people want modern buildings? Mix of modern and older buildings 	English Heritage advise that new buildings should be of their time
Green Group	
<ul style="list-style-type: none"> Choice of materials very important – key to integrating new development into old 	SPD will provide more detailed guidance on materials and will promote high quality
<ul style="list-style-type: none"> Need strong policies eg on height 	SPD will provide more detailed guidance on building height
<ul style="list-style-type: none"> Need to be careful though – fine line between regeneration and putting people off 	Noted. Poor quality schemes may impact negatively on the town's regeneration and renaissance
<ul style="list-style-type: none"> Need to decide what want to keep 	SPD should identify and map historic features and landmarks
<ul style="list-style-type: none"> Hierarchy of sites – some sites could take modern architecture better than others 	Noted. Some sites eg those in the town centre and

	around the harbour are more sensitive than those in more peripheral locations
<ul style="list-style-type: none"> • Can reflect in policy – if Pears House too high and got it wrong • Can confuse good design with in your face, brash development 	SPD will provide more detailed guidance on building height
White Group	Noted
<ul style="list-style-type: none"> • Too much modern architecture would change the character of the town • Pastiche – Irish St – a good copy – suitable for some sites • Harbour – could have iconic buildings but not every development has to be iconic • Flats around Hub in keeping • Copeland centre – tries to force the issue, tried to fit in and not successful 	<p>The SPD will aim to protect and enhance the town's historic character</p> <p>Successful modern copies of historic buildings require careful attention to detailing and materials and English Heritage's preference is for modern buildings to be of their own time.</p> <p>The SPD will consider which sites could accommodate iconic buildings more successfully</p> <p>Noted</p> <p>Noted</p>

Q3 How can we capitalise more effectively on the historic environment to attract investment and improve local confidence in the town?

Comments	CBC Response
Orange Group	
<ul style="list-style-type: none"> • Educate people not to feed the seagulls – anti social activity • Harbour was always industrial • Main streets too full of cars – streetscape project should help. People should be able to wander around town. • Harbour improvements over 20 years – really changed, people enjoying views, used now • Need to improve shop fronts – restore historical shop fronts 	<p>Some signs exist already around the harbour but consideration could be given to further education and awareness raising</p> <p>Noted</p> <p>Streetscape project should assist with improving the environment for pedestrians and cyclists</p> <p>Noted</p> <p>Copeland BC has an ongoing shop front improvement programme and there are proposals to bid for funding from the HLF TH1 programme for further improvements</p>

	to historic buildings in the town centre
Pink Group	
<ul style="list-style-type: none"> If a building needs TLC and isn't getting it, it affects neighbouring properties eg Methodist Church. Access / traffic difficult – says more about what not doing – very big buildings – could move library there. Very prominent. Most vulnerable building in town. Previously businesses would reinvest money in the town. Tesco – money goes out of town. Workington – essential shopping but dies by 2pm Sat – would people come to Whitehaven after this? Copeland – shop frontage scheme should be praised – would like to see more – encourages pride Need to promote more to local people Whitehaven born and bred campaign Streetscapes, free parking and shop frontages would all lead to a thriving town 	<p>The SPD will identify vulnerable / at risk buildings in the town centre</p> <p>Noted</p> <p>“Destination Whitehaven” aims to promote Whitehaven’s attractive historic environment and many independent shops to attract more visitors and shoppers to the town</p> <p>Copeland BC has an ongoing shop front improvement programme and there are proposals to bid for funding from the HLF THI programme for further improvements to historic buildings in the town centre</p> <p>Refer to Economic Development</p> <p>Refer to Economic Development</p> <p>Streetscapes project is being progressed by Cumbria CC and Copeland BC are working on a shop front improvement programme. Parking is being considered by the Parking Scrutiny Committee.</p>
Green Group	
<ul style="list-style-type: none"> Whitehaven people can be very destructive – gum on streets, degrading – need to do more to educate and do more to regenerate Problems – cleanliness – need to use materials suitable for maritime environment Heritage trails, more historic interpretation around town etc. Need to get people off the harbour and into the town Bexhill – townspeople involved in planning meetings, Delaware Pavillion, Rother District Council Need more publicity about Georgian heritage, a Georgian town 	<p>The proposed THI scheme would include a substantial training and education programme in relation to historic environment</p> <p>SPD will include design guidance on materials</p> <p>Para 5.4</p> <p>Noted</p> <p>The proposed THI scheme would include a substantial</p>

	training and education programme in relation to promoting the need to conserve and enhance the historic environment
White Group	
<ul style="list-style-type: none"> • Harbourside is best tool – but losing historic appeal • Toilets needed • Council need to lobby Harbour Commissioners • People will visit Harbour and then hopefully come into town • Schemes to improve very good but need good maintenance – keep on top of it eg Mt Pleasant steps 	<p>SPD will aim to protect the historic distinctiveness and high quality environment around the harbour</p> <p>Para 5.4</p> <p>Copeland BC continues to work closely with the Harbour Commissioners on a range of regeneration projects</p> <p>The SPD will promote improved linkages between the town centre and harbour areas</p> <p>Noted</p>

Accessibility

Q1 How can accessibility for pedestrians, cyclists and those with disabilities be improved?

Comments	Copeland BC Response
Orange Group	
<ul style="list-style-type: none"> • Vehicular traffic is a problem – it always has priority over pedestrians etc • Need to audit all potential problems/requirements eg: <ul style="list-style-type: none"> - Cycle racks - Also – not just wheelchair users, visually impaired, must be included - Clutter on pavements 	<p>Noted. Streetscape project should assist with improved traffic management</p> <p>SPD is being prepared in consultation with stakeholders and interest groups, and any relevant issues raised will be given due consideration</p>
Pink Group	
<ul style="list-style-type: none"> • Promote Streetscapes • If we are going to have decorative paving repair them properly • Funding is key to Streetscapes – schemes designed and wanting to go. Nuclear? Tesco? Other major retailers? 	<p>Noted</p> <p>Noted. SPD should address maintenance and durability of materials</p> <p>Streetscapes is a Cumbria CC led initiative and should be implemented in phases and when funding is secured.</p>
Green Group	
<ul style="list-style-type: none"> • Deal with abundance of traffic in centre • Reduce clutter on streets, even surfaces, better sign posting / legibility • Needs attention to signing to get pedestrians around town centre 	<p>Streetscape project should assist with improved traffic management</p> <p>Para 5.2</p> <p>Para 5.2</p>
White Group	
<ul style="list-style-type: none"> • Maintenance is key – especially to keep the quality • Tangier St / Duke St a difficulty – link to cycleway at Wagonway 	<p>Noted. SPD should address maintenance and durability of materials</p> <p>Streetscape project should improve accessibility across the town centre</p>

Q2 How can we improve linkages between the harbour and the town centre?

Comments	Copeland BC Response
Orange Group	
<ul style="list-style-type: none"> Physical problems – levels, surfaces, needs proper audit and new traffic management arrangements after interchange and Albion St and Strand St 	Streetscape project should address accessibility across the town centre
<ul style="list-style-type: none"> Sort out traffic light phasing to favour pedestrians over vehicles 	Streetscape project should improve traffic management in the town centre and give pedestrians greater priority over vehicles
<ul style="list-style-type: none"> Harbour to town centre? Use existing links and explore potential across King Street – Strand Street but Duke St needs special attention given increased pedestrian and cycle traffic likely from Interchange, cycleways etc 	Para 5.2. Streetscape project should improve traffic management in the town centre and give pedestrians greater priority over vehicles
Pink Group	
<ul style="list-style-type: none"> Signage – town map 	Incorporated into para 5.2
<ul style="list-style-type: none"> Deal with bottlenecks creating virtual pedestrianisation at centre 	Para 5.2. Streetscape project should improve traffic management in the town centre and give pedestrians greater priority over vehicles
<ul style="list-style-type: none"> Removal of rubbish on streets 	Paras 5.2 and 5.4
<ul style="list-style-type: none"> Forming harbour and town centre together – walkways through punching holes in King Street, creating an arcade street through to harbour. 	Para 5.2. Some units on King Street have dual frontages onto Strand St
Green Group	
<ul style="list-style-type: none"> Punching through to harbour from King Street. Problem more around the Tangier St / Duke St / Strand St cross roads 	Incorporated into para 5.2
<ul style="list-style-type: none"> Interchange and Tesco risk becoming the principal destination rather than the town centre itself. 	Improved signage and accessibility should assist with linking the proposed interchange and Tesco store with the town centre
<ul style="list-style-type: none"> Be practical – don't import "heritage" everywhere, tarmac for cars, better quality for people 	Streetscene project proposes some changes in materials to improve streetscape and public realm
<ul style="list-style-type: none"> Attention to surfaces: level and maintain properly 	Streetscape project proposes higher quality materials

<ul style="list-style-type: none"> Buses using Strand Street. Want to increase pedestrian flow between harbour and town centre Also interchange will increase pedestrian flows at Tangier St. 	Streetscape project proposes some shared surfaces and increased pedestrian priority on Strand St
White Group	Noted
<ul style="list-style-type: none"> Linkage harbour to town centre – train route shuttle and up to Kells 	Refer to Cumbria CC

Q3 How can linkages be improved between the town centre and residential areas?

Comments	Copeland BC Comments
Orange Group	
<ul style="list-style-type: none"> Between town centre and residential areas – more circular bus routes like the Mirehouse Circular and walks 	Refer to Cumbria CC
Pink Group	
<ul style="list-style-type: none"> Need to improve car parking, incorporate pay car parking in Morrisons and Bridges Centre (and build new one at Bransty end) 	Refer to Car Parking Scrutiny Committee and Task & Finish Group
Green Group	
<ul style="list-style-type: none"> Get rid of extraneous traffic like boy racers – shift balance between architects and people Cycling – proper signing and provision including facilities and shops for cyclists to encourage spending and return 	Streetscene project promotes increased priority for pedestrians Para 5.4
White Group	
<ul style="list-style-type: none"> Crossings – Strand St Bus etc probably sufficient. Potentially with new development could be linked across but two levels not supported 	Noted

Local Economy

Q1. How can we improve the market and shopping area?

Comments	Copeland BC Response
Orange Group	
Market	
<ul style="list-style-type: none"> Better quality market stalls Market only one day a week, focusing on promoting it to get a better mix of traders. Promote the market to get more niche traders and quality traders, e.g. farmers' market element. 	<p>Para 5.3. refer to Economic Development</p> <p>Para 5.3. refer to Economic Development</p> <p>Para 5.3. refer to Economic Development</p>
Shopping area	
<ul style="list-style-type: none"> Improve the multi-storey car park 	<p>Refer to Car Parking Scrutiny Committee and Task & Finish Group</p> <p>Proposals for Albion Sq include proposals to improve the multi storey car park</p> <p>Para 5.2</p>
<ul style="list-style-type: none"> Make it easier for pedestrians to find their way from car parks into town centre core – better signposting to and from car parks, more attractive crossings of Strand Street etc. 	
Pink Group	
Market	
<ul style="list-style-type: none"> Improved stalls Better facilities for traders Stalls should be 'back to back' in centre of Market Place – would look neater and make it easier to put in better stalls (and electricity e.g. for refrigeration?) Look at pitch rents – reduce for a time to attract more traders in? 	<p>Para 5.3. Refer to Economic Development</p> <p>Para 5.3. Refer to Economic Development</p> <p>Para 5.3. Refer to Economic Development</p> <p>Refer to Economic Development</p>
Shopping area	
<ul style="list-style-type: none"> Streetscape improvement badly needed. Measures needed to encourage footfall at harbour end of King Street. 	<p>Incorporated into paras 5.2 and 5.4</p> <p>New development on identified sites around the harbour area should increase activity in this area</p>
Green Group	

Market		
<ul style="list-style-type: none"> Looks tatty, low quality - better quality stalls would help. Attract specialist traders. Relocate to more attractive location – with covered area, e.g. bus station? 		Incorporated into para 5.3. Refer to Economic Development Para 5.3 Refer to Economic Development
Shopping area		
<ul style="list-style-type: none"> Work with owners to make shop units more attractive. 		Copeland BC has commenced a shop front improvement scheme and is considering submitting a bid for a THI scheme
White Group		
Market		
<ul style="list-style-type: none"> Provide better quality stalls (cf. Keswick) Back-to-back stalls in centre of Market Place Relocate – to harbour side e.g. around the Hub? 		Para 5.3. Refer to Economic Development Para 5.3. Refer to Economic Development Refer to Economic Development. Market Street is the historic centre for the market, but the area around the harbour is used for continental and food markets during the Whitehaven festival and for other special events.
<ul style="list-style-type: none"> We need more specialist markets - bringing in visitors; existing traders don't attract visitors and undercut shops. Research – find out what makes small town markets succeed. 		Para 5.3. Refer to Economic Development. Refer to Economic Development. A Retail Study has been produced as part of the evidence base for the Core Strategy.
Shopping area		
<ul style="list-style-type: none"> Better choice of shops needed. 		Refer to Economic Development. “Destination Whitehaven” promotes the town as a centre for independent and specialist retailing.
<ul style="list-style-type: none"> Too many units not fit for purpose: <ul style="list-style-type: none"> Landlords need to be pushed to look after them better; Some might be merged to form units big enough to be suitable for chains. 		Refer to Economic Development. Planning policies aim to support the vitality and viability of town centre shopping, while offering a choice of edge of centre sites for larger modern units.

Q2 How can the town make the most of the proposed development at Albion Square for Sellafield office workers?

Comments	Copeland BC Response
Orange Group	
<ul style="list-style-type: none"> • Shops need to raise their game • Later opening. 	Noted – Back in Business Programme Refer to Economic Development
Pink Group	
<ul style="list-style-type: none"> • Why would office workers come out to shop? Needs better offer, starting with cafes and sandwich sellers raising their game 	A significant influx of office workers into the town centre should encourage new and existing businesses to invest and diversify to meet new market demands.
Green Group	
<ul style="list-style-type: none"> • Make sure they are working flexible hours so they have time to go out at lunchtime • Better cafes with Wi-Fi might attract 'hot desk' staff looking to work alone. 	Working hours are a matter for the employer Noted. The Core Strategy supports the development and improvement of communication and information technology industries in Copeland.
White Group	
<ul style="list-style-type: none"> • Better range of lunchtime opportunities – cafes, sandwich retailers • Late closing days to encourage shopping after work • 'Living over the shop' scheme to encourage more flats in upper floors – might encourage some of them to live in the town centre. 	A significant influx of office workers into the town centre should encourage new and existing businesses to invest and diversify to meet new market demands. Refer to Economic Development Noted. THI scheme may encourage bringing empty space above retail units back into use

Q3 How can the town become more appealing to local shoppers from West Cumbria?

Comments	Copeland BC Response

<p>Orange Group</p> <ul style="list-style-type: none"> • Places to make people linger – cafes and pubs need to raise their game, e.g. hardly any pubs serve good food. • Encourage specialist shops. • Go for quality. 	<p>Noted. Refer to Economic Development</p> <p>The SPD will support Whitehaven’s role as a specialist shopping destination</p> <p>The SPD will promote high quality design</p>
<p>Pink Group</p> <ul style="list-style-type: none"> • More life in the harbour – Harbour Commissioners don’t do enough to encourage activity, especially trading, and sometimes obstruct it (e.g. by being unhelpful to people wanting to load and unload). • Tackle obstacles to improving mix of shops – • Rents are not realistic – discourage new businesses; • Rents are not consistent – e.g. different on different sides of King Street; • Too many charity shops, difficult to get rid of them as they have a competitive advantage and are helping keep rents high. • Parking • Free car parking needed. • Free car parking in late afternoon • Pay on exit wherever feasible • Review short stay and on street arrangements to make it more attractive for a short stop. • Stop parking on pavements – what happened to the wardens? • Better quality car parking – do up the multi-storey. 	<p>Noted. Para 5.4</p> <p>Noted</p> <p>Refer to Economic Development but rents will reflect current market rates</p> <p>Refer to Economic Development but rents will reflect current market rates</p> <p>Refer to Economic Development but rents will reflect current market rates</p> <p>Refer to Car Parking Scrutiny Committee and Task & Finish Group</p> <p>Refer to Car Parking Scrutiny Committee and Task & Finish Group</p> <p>Refer to Car Parking Scrutiny Committee and Task & Finish Group</p> <p>Refer to Car Parking Scrutiny Committee and Task & Finish Group</p> <p>Refer to Car Parking Scrutiny Committee and Task & Finish Group</p> <p>Refer to Car Parking Scrutiny Committee and Task & Finish Group</p> <p>Refer to Car Parking Scrutiny Committee and Task & Finish Group</p> <p>Refer to Car Parking Scrutiny Committee and Task & Finish Group</p>
<p>Green Group</p>	<p>Refer to Car Parking Scrutiny Committee and Task & Finish Group</p>

<ul style="list-style-type: none"> • Some larger units needed. 	<p>Local planning policies aim to support the vitality and viability of town centre shopping, while offering a choice of edge of centre sites for larger modern units.</p>
<ul style="list-style-type: none"> • Needs to diversify into distinct niches: <ul style="list-style-type: none"> ○ Encourage businesses trading in goods people don't buy on-line; ○ Encourage traders to get on-line operation to supplement over the counter sales; ○ Establish a 'made in Cumbria' image – Cumbrian traders selling quality Cumbrian goods. 	<p>Refer to Economic Development</p>
<ul style="list-style-type: none"> • Role for nuclear 'community benefit' money to smarten the shops; might include support for new start-ups e.g. mentoring, training, business support (role for Chamber of Trade?) 	<p>Refer to Economic Development</p>
<ul style="list-style-type: none"> • Use local control of business rates, if it is passed by Government, to support businesses fitting the above. 	<p>Refer to Economic Development</p>
<p>White Group</p>	
<ul style="list-style-type: none"> • Parking: <ul style="list-style-type: none"> ○ Either more car parks, or better signposting of those we have (eg Catherine Street car park under-used because no-one can find it). ○ Pay on exit. 	<p>Refer to Economic Development, Car Parking Scrutiny and Task and Finish Group</p>
<ul style="list-style-type: none"> • Role of Chamber of Trade: <ul style="list-style-type: none"> ○ Needs to be more positive and pro-active ○ Support for new traders 	<p>Refer to Economic Development</p>

Tourism and Leisure

Q1 How can facilities for day visitors and tourists be improved?

Comments	Copeland BC Response
Orange Group	
<ul style="list-style-type: none"> • Provide designated coach parking within easy reach of refreshments and toilets (or provide toilets at the coach park). • Locate toilets where people want them i.e. in a central point in town. • Adapt buildings which Copeland Borough Council own i.e. The Beacon/Tourist Information Centre so provide public toilets. • Any toilets that are provided must be manned. • The Interchange should incorporate a toilet block and coach drop off point. • Need a four star hotel in the town. 	<p>Para 5.4</p> <p>Para 5.4</p> <p>Incorporated into para 5.4</p> <p>Incorporated into para 5.4</p> <p>Refer to Cumbria CC</p> <p>Para 5.4</p>
Pink Group	
<ul style="list-style-type: none"> • Toilets – need adequate amount, open at night and in the right place. • Signage is inadequate. • Car Parks – need better direction signage and signs showing number of spaces available. • Railway station needs toilets. • The car park at Wellington Beach is under utilised as no one knows it is there. • Town Centre maps at locations in the town centre to orientate visitors. • Events – encourage people to visit Whitehaven, the group debated the benefit to shops. • Use mobile phone technology – text to be sent to visitors when arrive in Whitehaven with maps and list of shops etc. • Production of Shoppers Guide/Diary and distribution of this outside of town to attract visitors. • Promotion of Whitehaven as a place to visit. 	<p>Para 5.4</p> <p>Para 5.4</p> <p>Paras 5.2 and 5.4</p> <p>Refer to Cumbria CC</p> <p>Para 5.2</p> <p>Para 5.2</p> <p>Noted</p> <p>Refer to Tourist Information Centre and West Cumbria Tourism</p> <p>Refer to Economic Development</p> <p>Refer to Tourist Information Centre and West Cumbria Tourism</p>
Green Group	
<ul style="list-style-type: none"> • Need better long term parking facilities. 	<p>Refer to Car Parking Scrutiny Committee and Task</p>

		& Finish Group
<ul style="list-style-type: none"> Needs to be parking at the right price. 		Refer to Car Parking Scrutiny Committee and Task & Finish Group
<ul style="list-style-type: none"> Pay on exit to encourage longer stays. 		Refer to Car Parking Scrutiny Committee and Task & Finish Group
<ul style="list-style-type: none"> Need to take into account movement patterns of visitors for links to town centre and location of facilities. 		Noted
<ul style="list-style-type: none"> Need active harbour frontages, more uses on harbourside so more activity. 		Para 5.4
<ul style="list-style-type: none"> Need a range of free events on the harbourside. 		Para 5.4
<ul style="list-style-type: none"> More eating establishments for eating out. 		Para 5.4
<ul style="list-style-type: none"> Hope that Bardywell Lane development may link The Beacon to the harbourside and town centre. 		Para 8.2.2
<ul style="list-style-type: none"> Geese on the harbour are a problem with people being attacked. 		Noted. Refer to Harbour Commissioners
<ul style="list-style-type: none"> Agreement that the Harbour and Town Centre need to be improved visually 		Para 5.5
<ul style="list-style-type: none"> Any facilities that are provided must be well maintained in the future. 		Para 5.5
<ul style="list-style-type: none"> Noted that Mount Pleasant area needs maintenance work - some metal work is rusting. This area is also a problem in terms of youths congregating here and drinking. 		Para 5.5 Refer to Emma Dickinson, Youth Engagement Officer
<ul style="list-style-type: none"> YWCA on New Lowther Street is a potential development opportunity 		Noted
<ul style="list-style-type: none"> Need to link the Harbour to Haig Pit attraction. 		SPD will refer to development opportunities and local buildings at risk Incorporated in para 5.2
White Group		
<ul style="list-style-type: none"> Need toilets with baby changing facilities on the harbourside 		Para 5.4
<ul style="list-style-type: none"> Event organisers should be made to supply adequate toilet facilities for their event. 		Copeland BC requires adequate toilet facilities to be provided at events
<ul style="list-style-type: none"> Pay on exit car parks to encourage people to stay. 		Refer to Car Parking Scrutiny Committee and Task & Finish Group
<ul style="list-style-type: none"> More parking needed in the right location – ideally located around the periphery of the town. 		Refer to Car Parking Scrutiny Committee and Task & Finish Group
<ul style="list-style-type: none"> New developments could incorporate public car parking. 		Development management process requires

	developments to meet adopted parking standards, and travel plans may be required to encourage more sustainable transport methods
<ul style="list-style-type: none"> • Gateways into the town are an eyesore and need improved. 	Para 5.1
<ul style="list-style-type: none"> • Potential business opportunity for a tourist train to operate from the harbour to Haig Pit Museum - could help to link attractions to the town centre – both visitors and local people could use this service. 	Refer to Tourist Information Centre and West Cumbria Tourism
Q2 How can the town centre take advantage of its position as a starting point for the C2C?	
Comments	
Orange Group	
<ul style="list-style-type: none"> • Better signposting particularly at the rail station for those starting C2C. 	Paras 5.2 and 5.4
<ul style="list-style-type: none"> • Need more direction for those starting C2C to indicate where the starting point is. 	Paras 5.2 and 5.4
<ul style="list-style-type: none"> • More promotion that Whitehaven is the starting point. 	Paras 5.2 and 5.4
<ul style="list-style-type: none"> • Need accommodation - want people doing the C2C to stay in the town. 	Para 5.4
<ul style="list-style-type: none"> • Facilities for cyclists near the start. 	Para 5.4
<ul style="list-style-type: none"> • Accommodation which appeals to cyclists. 	Para 5.4
<ul style="list-style-type: none"> • Opportunity for joined up packages, i.e. accommodation, storage of cycles etc. 	Para 5.4
Pink Group	
<ul style="list-style-type: none"> • Initiative where those taking part in the C2C get books/cards stamped at businesses in the town – incentives. 	Refer to Economic Development
<ul style="list-style-type: none"> • Need more promotion of Whitehaven as a starting point for the C2C. 	Refer to Tourist Information Centre and West Cumbria Tourism
<ul style="list-style-type: none"> • Signage for the C2C needs improved. 	Para 5.2
<ul style="list-style-type: none"> • More events needed – i.e. antiques roadshow, cycle fest like in South Lakes. 	Para 5.4
Green Group	
<ul style="list-style-type: none"> • Need to mark the start of the C2C more effectively. 	Para 5.4
<ul style="list-style-type: none"> • Need more accommodation which appeals to cyclists in Whitehaven. 	Para 5.4
<ul style="list-style-type: none"> • Businesses could be encouraged to operate a discount scheme for those taking part in the C2C. 	Refer to Economic Development
<ul style="list-style-type: none"> • The Cumbria Coastal Railway – trains need to accept more bikes. 	Refer to Cumbria CC
White Group	

<ul style="list-style-type: none"> Marketing idea – creation of a C2C website where those wishing to do the C2C register on a website with an e-mail address, this gives valuable contact details for the person. Information on the website and discount vouchers could be available. It could improve the overall C2C experience. 	Refer to Economic Development
<ul style="list-style-type: none"> Local Photographers could take advantage of Whitehaven being the starting point by offering “official shots” of those cycling the route. 	Refer to Economic Development
<ul style="list-style-type: none"> Lockable indoor bike stands near to the railway station. 	Refer to Cumbria CC
<ul style="list-style-type: none"> Accommodation with secure cycle facilities. 	Paras 5.2 and 5.4
<ul style="list-style-type: none"> Need a mix of accommodation in the town, also need accommodation for large groups. 	Incorporated into para 5.4
<ul style="list-style-type: none"> Need a quality hotel in Whitehaven. 	Para 5.4

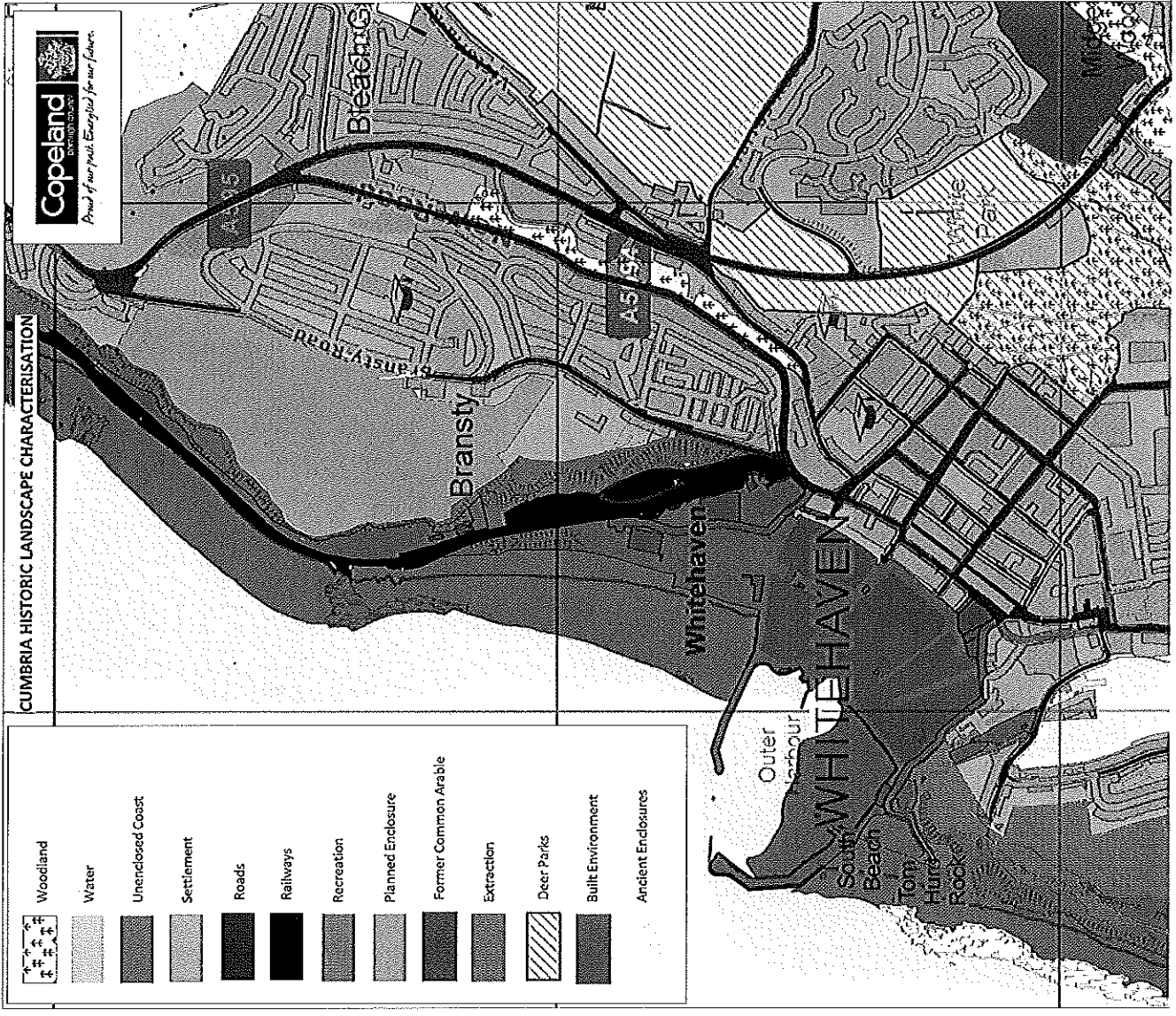
Q3 How can the town use its historic environment / harbour more effectively to attract tourists and visitors?

Comments	Copeland BC Response
Orange Group	
<ul style="list-style-type: none"> Take traffic off Lowther Street. 	Streetscape project proposes more shared surfaces and greater pedestrian priority
<ul style="list-style-type: none"> Need more activity on the harbourside. 	Para 5.4
Pink Group	
<ul style="list-style-type: none"> Pedestrianisation of town centre would promote link with harbour. 	Para 5.2. Streetscape project should improve linkages between the town centre and harbour areas
<ul style="list-style-type: none"> Encourage tables outside cafes ‘continental feel’, attract families at night. 	Para 5.4
<ul style="list-style-type: none"> We need to clean the streets with water – cleanliness and maintenance is important. 	Para 5.4
<ul style="list-style-type: none"> Stone sets – don’t repair with tarmac. 	Para 5.4
<ul style="list-style-type: none"> Ensure maintain stone work and have enough stocks for maintenance. 	Para 5.4
Green Group	
<ul style="list-style-type: none"> Should promote our heritage through a town trail. 	Refer to Tourist Information Centre and West Cumbria Tourism
<ul style="list-style-type: none"> More leaflets in the Tourist Information Centre. 	Refer to Tourist Information Centre and West Cumbria Tourism

White Group		
<ul style="list-style-type: none"> • Utilise the Solway – leisure vessels, diving etc. 		Para 5.4
<ul style="list-style-type: none"> • Watersports facility in the harbour. 		Para 5.4
<ul style="list-style-type: none"> • Blue Plaques – more of them and a blue plaque trail. 		Refer to Tourist Information Centre and West Cumbria Tourism

Appendix 2

Whitehaven Historic Character Maps



CUMBRIA HISTORIC LANDSCAPE CHARACTERISATION



	Woodland
	Water
	Unenclosed Coast
	Settlement
	Roads
	Railways
	Recreation
	Planned Enclosure
	Former Common Arable
	Extraction
	Deer Parks
	Built Environment
	Ancient Enclosures

Breathing

Bransley Road

Whitehaven

Outer Harbour

WHITEHAVEN

South Beach

Tom Hurd Rocks

ASB

Whitehaven Town Centre and Harbourside SPD Issues and Options
Draft Consultation Plan

Introduction

The Whitehaven Town Centre and Harbourside SPD will address redevelopment opportunities for a number of priority regeneration sites in Whitehaven Town Centre and Harbourside. The guidance will provide detailed development briefs for these sites as well as setting out design and conservation guidelines for these sites and for the Whitehaven Town Centre Conservation Area. It will support policies in the Core Strategy DPD and Site Allocations DPD.

Consultation

We are committed to engaging the community at all stages of the planning process. The Statement of Community Involvement (SCI) (adopted 2008) sets out how we will consult the local community and stakeholders on planning documents, the Council must adhere to the SCI when producing Local Development Documents.

The Planning Policy Team have been consulting informally on issues and options for the document over the summer. Consultation activities to date have included:

- Attendance at meetings of the Whitehaven Locality Partnership, Whitehaven Town Centre Development Group and the Access Working Group of the Disability Forum
- Work with Emma Dickinson Youth Engagement Officer to engage the local youth groups and youth forum
- Work with local schools – Whitehaven High School, Bransty School and Valley Primary
- 'Open Drop Ins' for the Public were held on Saturday 23rd and Thursday 28th July between 10am and 4pm at the 'Pop Up Shop' in the Market Place
- A Business and Councillor event at The Copeland Centre on 9th August
- Mailing to relevant contacts of our database
- Using electronic media to promote activities
- Press coverage to raise awareness of the document and process.

Next Stage - Having considered the responses received we are producing the Whitehaven Town Centre and Harbourside SPD Issues and Options Document which will be published for a 6 week consultation in October/November 2011.

Document Format

The document will be available as a printed document and electronically. We will also produce a summary flyer which can be more widely distributed.

Proposed Activities for the Formal Issues and Options Consultation

The following activities have been identified for the Issues and Options consultation of the Whitehaven Town Centre and Harbourside SPD, the activities proposed meet the requirements set out in our SCI for Supplementary Planning Documents.

<u>Electronic Media</u>	<p>Copeland Borough Council website – the document, consultation responses, summary, consultation statement and response forms will be available on the CBC website.</p> <p>Have Your Say consultation portal – the consultation will be added to the Cumbria Consultation and Community Engagement Database.</p> <p>Facebook – The consultation will be posted onto the Copeland BC Facebook page with link to the website pages.</p> <p>Twitter – Use the current Copeland BC Twitter account to ‘tweet’ about the consultation.</p>
<u>Exhibitions /Presentations</u>	<p>Exhibitions – possible drop in exhibition jointly with Townscape Heritage Initiative.</p> <p>Community Centres - utilise community centres for engaging hard to reach groups.</p> <p>Places Matter have requested a Design Review Session – date to be confirmed.</p>
<u>Local Groups</u>	<p>A copy of the Issues and Options document and summary flyer will be sent to local groups, request attendance at relevant meetings, e.g. Whitehaven Locality Partnership, Access Working Group of the Disability Forum.</p>
<u>Local press / publications</u>	<p>We will work with the Communications Team to maximise opportunities in the local press.</p> <p>An article regarding the Consultation has been submitted for Copeland Matters September issue.</p>
<u>Libraries</u>	<p>Deposit documents at libraries and council offices.</p>
<u>Mailing</u>	<p>Mailing to those who were involved in the previous stages of consultation.</p>
<u>Poster / Flyer Distribution</u>	<p>Distribute posters/flyers to shops in town centre, doctors surgeries, supermarkets, libraries, community centres. Anywhere else?</p>
<u>Youth Engagement</u>	<p>A copy of the Issues and Options document and summary flyer will be sent to the Youth Forum and schools who took part in the summer consultation process.</p>
<u>Councillors</u>	<p>Awareness raising through surgeries??</p>

We welcome any further suggestions.

Vikki Gregg
 Planning Policy Officer
 20/09/2011

Item 6
Appendix Item 3

Copeland Local Development Framework Publication Document

**CORE STRATEGY DPD
DEVELOPMENT MANAGEMENT POLICIES DPD**

**Economic Opportunity and Regeneration: Policies
ER7 to ER11**

Sustainable Settlements Policies

for Consideration by the LDF Working Party

29 September 2011



Proud of our past. Energised for our future.

Introduction

This paper is a working draft of part of Chapter 4 and the whole of Chapter 5 of the final Core Strategy and associated Development Management Policies. It comprises:

- Economic Opportunity and Regeneration Policies ER7 to ER11
- Sustainable Settlements Policies

It should be noted that the different members of the team have drafted different parts of the text and there may be areas of overlap or duplication. This also means that some paragraph numbering may not correlate to the final version once it is produced (issues with automatic numbering in Microsoft Word)

We intend to edit the document as a whole once all of the different chapters have been updated.

4 Economic Opportunity and Regeneration

Text and policies for ER1 to ER6 are still to be finalised

4.1 Developing Town Centres and Other Centres

- 4.1.1 This policy sets out the strategic approach towards development in town centres and other service areas which include the Local Centres (listed in Policy ST2) and neighbourhood centres and identifies the focus and key actions required.

Policy ER7 – Principal Town Centre, Key Service Centres, Local Centres and other service areas: Roles and Functions

Development will be required to meet the needs of the area, to be of a scale appropriate to the centre, and to not adversely impact on the vitality or viability of other nearby centres. The purpose of each centre will differ according to its role and function. Development objectives are to:

- A Reinforce the role of Whitehaven as the Principal Town through the promotion of a flexible, mixed-use approach, the improvement of strategic and local accessibility, and supporting its continued growth**
- B Support Whitehaven's role as a tourist and visitor destination linked to its unique heritage and independent and specialist retailers¹**
- C Protect and where possible enhance the services and facilities provided in the Key Service Centres of Cleator Moor, Egremont and Millom**
- D Seek to ensure that the Local Centres and neighbourhood centres maintain essential shops and services to meet the needs of local communities**
- E Encourage evening and night-time uses that contribute to the vibrancy, inclusiveness and economic vitality of centres. Such uses should accord with Policies DM6 and DM7.**

- 4.1.2 Policy ER7 aims to maintain a hierarchy of interconnected, vibrant and inclusive Principal Town and Key Service Centres that are mixed-use hubs for retail, commercial, leisure, civic and housing provision. Workington in neighbouring Allerdale, is the highest ranking town within the retail settlement hierarchy across West Cumbria. The West Cumbria Retail Study (2009) recognises that Whitehaven is not seeking to compete with Workington, but rather needs to focus on developing a complementary role building upon its offer of independent and specialist retailers, the historic environment and heritage. This reflects a need for the town to adapt to a new commercial reality.
- 4.1.3 The existing retail hierarchy will be supported by concentrating civic uses and service provision in centres of the appropriate scale; promoting mixed-

use and multi-purpose centres with a mix of unit sizes and types (including smaller unit sizes) appropriate to the size of each centre; and promoting good design within the centres so as to ensure appropriate and well-integrated spatial layouts which connect to surrounding areas.

- 4.1.4 No major change to the retail structure within the Borough is proposed in order to meet the existing and future need. Rather, the emphasis is on maintaining and enhancing the viability and vitality of the existing retail centres. Whitehaven has therefore retained its status as the Principal Town Centre, and Millom, Egremont and Cleator Moor continue as Key Service Centres.

4.2 Whitehaven Town Centre

- 4.2.1 Whitehaven is the Principal Town in Copeland and the main town centre for the Borough. The West Cumbria Retail Study (2009) confirms that there is significant potential for future development in the Town Centre.

Policy ER8 – Whitehaven Town Centre

In Whitehaven town centre, development will be encouraged which:

- A Responds to and consolidates the status of Whitehaven as the first and most complete post-mediaeval planned town in the country**
- B Improves the links and re-establishes the connectivity between the town centre and the Harbour**
- C Enhances the retail function of ground floor premises (see also Policy DM7 A and the designation of a Retail “Primary Frontages Area”)**
- D Diversifies the ‘offer’ within the town centre, and improves the evening and night time economy**
- E Improves Whitehaven’s tourism offer, particularly in relation to serviced accommodation, improved visitor facilities and access to the coast.**
- F Enhances the key gateway sites and approaches into the town, wherever practicable providing car parking for both the development itself and the town centre**
- G Creates a series of new and improved public spaces to establish stronger visual links and better access between the town centre and Harbour**
- H Improves the integration of new and existing development into the urban grain. Maintains high standards of design consistent with the setting of a Conservation Area of national significance**
- J Diversifies the range of residential accommodation in the town centre, including the conversion and re-use of vacant floors over shops**

- K Improves the integration and prestige of public transport in the town centre**
- L Improves the range of activities available to local residents and visitors**
- M Incorporates strategic redevelopment schemes in relation to Policy ST3 and improvements to the public realm and traffic environments**

The Whitehaven Town Centre boundary will be redrawn to reflect the anticipated growth and development within the area.

Any development proposed in Whitehaven Town Centre should also accord with Policies DM6 and DM7.

A new Supplementary Planning Document (SPD) is being prepared to provide design guidance for new development in the town centre and harbourside areas.

- 4.2.2 The 2009 Retail Study showed that there was need for additional comparison and convenience retail floor space in Whitehaven over the coming years given that it is the Principal Town in the Borough, serves a large catchment area, and has been identified as the main focus for growth and regeneration.
- 4.2.3 There is a need to consider a possible extension to the town centre boundary to allow for the expansion of retailing and other services and to encourage investment and development on sites located around the periphery. Shop units within the historic core do not always meet the needs of modern businesses, and carefully managed and well designed new development would support economic growth and allow Whitehaven to prosper.
- 4.2.4 A development prospectus is being prepared to promote "Destination Whitehaven" to potential investors. This document will provide information on key development sites within the wider context of regeneration opportunities and the town's growing role as a key retailing, service and tourist destination.

4.3 The Key Service Centres, Local Centres and other smaller centres

- 4.3.1 The three Key Service Centres offer the next level of provision below the Principal Town of Whitehaven. Egremont and Cleator Moor are relatively close to Whitehaven, and their services and potential reflect that fact. Millom, some 50km to the south, provides a wider range of services to its hinterland, and will continue to offer a level of provision that reflects its location nearer to Barrow. Outwith these three towns, small-scale shopping and other services are provided within Local Centres and some smaller rural villages and urban neighbourhood centres which require planning policy protection

Policy ER9 – The Key Service Centres, Local Centres and other smaller centres

A In Key Service Centres: Cleator Moor, Egremont and Millom:

- i) Appropriate retail and service sector provision will be allowed within the defined boundaries of each Key Service Centre to meet the needs of local residents and to facilitate small scale tourism. Evening entertainment and leisure uses will also be acceptable if they meet the criteria as set out in ER7(E) above.**
- ii) The town centre boundaries of the Key Service Centres will be reviewed and may be redrawn to reflect current circumstances**
- iii) Further physical improvements in association with town centre management initiatives will also be considered to attract more visitors and to reduce levels of vacancy**
- iv) Development should also accord with Policies DM6 & DM7**

B In the Local Centres and smaller centres:

- i) The provision of shops and services will be maintained to ensure they continue to serve their small catchment areas with basic goods and services.**

4.3.2 The 2009 Retail Study found that Egremont, Cleator Moor and Millom have high vacancy rates, in some areas above the national average, with below average representation of the service sector provision and limited entertainment/leisure provision. Security and crime were also found to be key concerns, particularly in Cleator Moor. Support for further physical improvements to the town centres, improved town centre management, and wider initiatives to attract more visitors are identified in the Retail Study as key objectives for the towns and are picked up in the strategic regeneration policies set out in Chapter 3 of the Publication Core Strategy.

4.3.3 The study did not identify any need for major change to the Borough's retail structure in order to meet future and existing need. It did however suggest that planning for the Key Service Centres should recognise that the retail / service function of these towns is shrinking and should seek primarily to retain their traditional core retail / service areas. The policy emphasis therefore is on maintaining and enhancing the viability and vitality of their existing centres rather than seeking expansion and growth.

4.9 Renaissance through Tourism

- 4.9.1 Tourism is already an important feature of the Borough's economy, but it offers considerable potential for further growth and benefit. West Cumbria will not replicate the performance of an internationally-renowned tourism area like the Lake District, but it can draw on its proximity to the Lakes, its rich maritime and industrial heritage and other tourism resources to create additional employment and wealth. Great strides have already been made, notably at Whitehaven Harbour, and the challenge now is to follow that up with better range, quality and integration with the National Park.

Policy ER10 – Renaissance through Tourism

The Council will maximise the potential of tourism in the Borough and will seek to :

- A Expand tourism outside the Lake District National Park boundaries, with a complementary offer that takes pressure off the National Park's busiest locations, and delivers economic benefits in the Borough**
- B Locate new tourist accommodation, facilities and attractions where there is proven capacity for additional visitors to be accommodated without adverse environmental or amenity impacts, with consideration given to the following:**
 - i) Focus large-scale tourist accommodation and attractions in Whitehaven and develop the town as a base for exploring the wider area**
 - ii) Encourage modest-scale development in the Key Service Centres of Cleator Moor, Millom and Egremont which takes pressure off more sensitive areas**
 - iii) Support small-scale development within the smaller villages and countryside, if proven necessary to enhance the Borough's existing place-bound assets**
 - iv) Permit holiday accommodation which meets the requirements of Preferred Option Policy DM9**
- C Support appropriate tourism development which accords with the principles of sustainable development and does not compromise the special qualities and character of the surrounding area or public access thereto on allocated Tourism Opportunity Sites in the following locations:**
 - i) Hodbarrow**
 - ii) Ehen / Keekle Valleys**
 - iii) Whitehaven Coastal Fringe**
 - iv) Lowca Coastal Area**

- D Support appropriate developments which improve and enhance the quality of the tourism product**
- E Wherever possible tourism providers will be required to ensure that accommodation and attractions are well connected to other tourist destinations and amenities, particularly by public transport, walking and cycling**
- F The Council will work with the Lake District National Park Authority, Cumbria Tourist Board, West Cumbria Tourism Partnership and other tourism organisations in marketing, co-ordinating and managing the development of the Borough's offer and to maximise the benefits of the 'Lake District' brand**

All tourism related developments should accord with Preferred Option Policies DM9 and DM10.

- 4.9.2 There is significant scope for Copeland to maximise opportunities in the tourism sector, capitalising on what makes it unique. Expanding the tourism offer and appeal of the Borough outside the National Park will help to complement the tourism offer of the Lake District, particularly with the coastal asset and the presence of a major heritage town; to offer alternatives to the busiest core locations in the Lakes; and create economic benefit in the rest of Copeland. The proposed Whitehaven Transport Interchange will play a vital role in boosting tourism in the wider borough through the provision of sustainable transport modes for visitors to explore.
- 4.9.3 Day visits currently dominate the tourism sector, therefore there is potential to expand the tourism offer to encourage longer stays and to develop the weekend and short-break market. Growth in the wider business economy, for example in the energy sector, will also provide an opportunity for growth in business tourism.
- 4.9.4 Improvements are needed in order to achieve this, enhancing the broader lifestyle offering (and hence also making Copeland a better place to live in as well as visit). This includes encouraging improved quality in accommodation, attractions, and the food / beverage / restaurant offer; improved public transport, including better weekend rail services; improving walking and cycle paths and their signage; enhancing the public realm; and signposting parking and 'gateway' areas to town centres and attractions.
- 4.9.5 Away from the towns, major Tourism Opportunity Sites will provide for larger-scale tourist activities that may not be possible or appropriate in the urban areas. The Tourism Opportunity Sites will support appropriate, low impact development for the purpose of quiet enjoyment. Development will be expected to relate to the character of the site and wider area. Appropriate development may include activity areas linked by footpaths, cycle routes and landscaping for instance. Some small-scale hard development may be permitted at gateways to the site to facilitate activity in the wider area. The Sites are designed to act as catalysts to boost further supporting tourism infrastructure in the nearby service centres thereby improving the

tourism/lifestyle offering and providing valuable economic benefits, safeguarding existing businesses and jobs and creating opportunities for the development of new businesses and employment.

4.9.6 The Tourism Opportunity Sites are:

- Hodbarrow: where the combination of water sports and the nature interest need to be compatible; on the fringes of the National Park
- Ehen/Keekle Valleys: development associated with urban fringe leisure and recreational use of the valleys
- Whitehaven Coastal Fringe – the 'Colourful Coast': linking Whitehaven Harbour with Haig Pit and St Bees Heritage Coast. Leisure and recreational use not compromising the special qualities and character of the undeveloped coast or public access thereto
- Lowca: potential at and around the approved development site at Lowca, Micklam and the coast to the north.

Key Policy Context/Framework/References

- PPS7: Sustainable Development in Rural Areas (2004)
- North West Regional Spatial Strategy (RSS) Policy W6 (2008)
- Cumbria and the Lake District Joint Structure Plan Policy EM16 (2006)
- Copeland Local Plan Policies TSM 1-6 (2006)
- Cumbria West Coast Tourism Study Draft Final Report (2009)

4.10 Developing Enterprise & Skills

4.10.1 The nature of employment development in Copeland has mirrored the development in its economy over recent decades, with a focus on the nuclear and energy related industries, and on the businesses which support them. Potential growth sectors for the future include further nuclear and energy-related environmental technologies, and tourism. Green business practices and green industries such as renewable energy, energy management and material processing can also help to diversify the Borough's economy.

4.10.2 However, Copeland's workforce needs to be equipped with the right skills to meet the opportunities provided by such employment growth. Copeland currently has higher levels than the Cumbria average (though comparable with the national figures) of worklessness and unemployment; particular concerns are the youngest working-age group, and some deprived localities.

- 4.10.3 Levels of enterprise are low; barriers to enterprise include a lack of skills, confidence, and support services - as well as physical constraints such as distance and slow transport links.

Preferred Options Policy ER11 – Developing Enterprise & Skills

The Council will work with its partners to promote and develop the skills and employment opportunities of local people by:

- A Enhancing inward investment and promoting the diversification of the Borough's economy, working with partners to support new and expanding employment sectors, particularly energy-related and environmental and innovative energy technologies, such as tidal, off shore wind and micro-generation**
- B Supporting the development of education and training facilities, to encourage people to develop the qualifications and skills, that will be attractive to new business and vital for new enterprise**
- C Supporting the development of commercial units which meet the needs of businesses, encourage start ups and promote further expansion in order to retain enterprise, jobs and skills within the Borough.**
- D Encouraging the further development of Research and Development and education and training facilities at the Westlakes Science & Technology Park, along with Further Education Partners**
- E Supporting new spin-off business development that capitalises on the existing or emerging Intellectual Property that exists at Sellafield**
- F Focussing employment training and initiatives in Whitehaven, the 3 Key Service Centres, the Westlakes Science and Technology Park and the Sellafield site where there is good access to the strategic road network and where the use of public transport can be maximised**
- G Ensuring that the benefits of regeneration in Whitehaven provide a catalyst for change in the communities living nearby, by improving connectivity, including transport links and securing training and employment agreements**

- 4.10.4 Extending and diversifying the Borough's economic base, increasing the number of new business start-ups, ensuring enterprise units meet the needs of businesses throughout their lifecycle, ensuring sites and policies promote entrepreneurship, tackling worklessness, improving, building on and retaining the skills base of Copeland's residents including land management skills for the rural environment, and removing barriers to employment are key objectives and priorities of the Council, Community Strategy and the Energy Coast Masterplan in the delivery of economic growth in the Borough.

- 4.10.5 The provision of the Lakes College West Cumbria, the University of Cumbria and Energus at Lillyhall (just outside the Copeland boundary to the north) provide valuable training and education resources for Copeland; there are opportunities to work with these and other training providers in the provision of outreach training to be provided in the Borough.

Key Policy Context/Framework/References

- PPS7: Sustainable Development in Rural Areas (2004)
- West Cumbria Spatial Master Plan Working Paper 1 Baseline Analysis (2006)
- West Cumbria Spatial Master Plan Working Paper 2 Energy Technology Nuclear (2007)

Development Management Policies for Economic Opportunity and Regeneration

Managing Non-Retail Development in Town Centres

- 9.2.17 The strategic approach towards the Borough's town centres is set out in Policies ER7-9. Proposals for key regeneration sites are set out in Policy ST3. This policy supports in particular the implementation of Policy ER7 in terms of protecting the retail function of town centres.

Policy DM6 – Managing Non-Retail Development in Town Centres

The Council will protect and promote the vitality and viability of the defined town centres by:

- A Seeking continuous retail outlets and frontages at the ground floor of premises within the designated Primary Frontages Area in Whitehaven**
- B Permitting non-retail uses such as cafes, bars, restaurants and other leisure uses which support the night time economy, or financial and professional services, provided that such uses do not lead to an overconcentration of non retail units**
- C Requiring non-retail uses in premises with shop frontages to incorporate a suitable window display**

- 9.2.18 Copeland's Principal Town of Whitehaven and its Key Service Centres of Cleator Moor, Egremont and Millom all contain defined town centres which are the focus for retail development for both convenience and comparison shopping.
- 9.2.19 Whitehaven also contains a defined Primary Frontages Area, covering the most intensive area of shopping along King Street, between Market Place and Duke Street. The concentration of continuous shopping frontages is a major attraction to shoppers in Whitehaven and the Council will seek to

maintain this provision by resisting non-retail development at the ground floor of these premises. Non-retail uses, however, will still be acceptable above ground floor level in these locations. The approach otherwise is to protect and enhance the role of all the town centres by ensuring that services and facilities are concentrated within town centre boundaries. All town centres should provide a diverse offer, and this must be balanced to ensure that vitality and viability are protected. Therefore the policy seeks to regulate non-retail uses in defined town centres, whilst recognising the important role that leisure and food and drink activities have in the tourism and night time economies.

9.2.20 The test of 'over concentration' will generally be when three consecutive premises or more are likely to fall into non-retail use.

Key Policy Context/Framework/References

PPS6: Planning for Town Centres (2005)

North West Regional Spatial Strategy (RSS) Policies W5, DP1-2 & RDF2 (2008)

Copeland Local Plan Policies TCN 1, 2 & 11 (2006)

Takeaways, Pubs and Nightclubs, Betting Shops, Pawnbrokers and Amusement Arcades in Town Centres and Local Centres

9.2.21 This policy reinforces the Council's approach towards non-retail uses in town centres and introduces controls in Local Centres to regulate particular types of non-retail uses which could have an adverse effect on the provision and quality of their services and facilities. This Policy complements the strategic approach for the provision of community facilities set out in Policy SS4, objectives for the Borough's town centres in Policy ER7, and the strategic objectives for settlements in Policy ST2.

Policy DM7 – Takeaways, Pubs and Nightclubs, Betting Shops, Pawnbrokers and Amusement Arcades in Towns and Local Centres

Proposals for takeaways, pubs and nightclubs, betting shops, pawnbrokers, amusement arcades, or other such similar uses will only be permitted within the defined town centres and Local Centres provided that they do not:

- A Result in the loss of a prominent retail unit**
- B Undermine the function of the Town or Local Centre in providing key retail and other services and facilities which are essential to support local communities**
- C Adversely impact on the vitality and viability of the existing centre in any way**
- D Be detrimental to residential amenity, health and safety issues**

9.2.22 An overbalance or concentration of uses such as takeaways, pubs and nightclubs, betting shops, pawnbrokers and amusement arcades risks undermining not only the vitality and viability of the larger town centres but also the role of smaller centres and their offer of vital local services to communities. The Council therefore considers that a criteria-based policy which considers the key development issues and impacts associated with such uses is appropriate.

Key Policy Context/Framework/References

PPS1: Delivering Sustainable Development (2005)

Good Practice in Managing the Evening and Late Night Economy: A Literature Review from an Environmental Perspective (ODPM 2006)

PPS 6: Planning for Town Centres (2005)

Copeland Local Plan Policies TCN1, 6-8 (2006)

Tourism Development in Rural Areas

9.2.23 Encouraging a tourism renaissance in a sustainable way is a key principle which is established in Policy ST1.

Policy DM8 – Tourism Development in Rural Areas

Outside the Tourism Opportunity Sites, tourism facilities will be permitted in rural areas where it involves small scale development and:

- A Which is demonstrated to be necessary for enhancing the natural, cultural or heritage value of the place-bound asset; or**
- B Involves the re-use, conversion or replacement of existing buildings on site**

The development of new or extended buildings will only be considered favourably where there is a robust case that demonstrates that there is a genuine need that cannot be met through the conversion of existing rural buildings.

9.2.24 Whilst there is a strategic thrust in Policy ER10 towards concentrating tourist facilities and accommodation in the Borough's settlements particularly those within or in close proximity to the Tourism Opportunity Sites, there are other place-bound natural, cultural and heritage assets ("place-bound" in terms of assets which cannot be provided at alternative locations) which could be promoted to improve the Borough's tourism offer, but this must be balanced carefully with avoiding any unnecessary

impacts of tourism related development on rural areas and the very assets that developments seek to promote. A carefully managed approach is therefore necessary to ensure that an appropriate balance can be struck between raising the profile of the Borough through its assets and the potential impacts of development, especially in rural locations.

Key Policy Context/Framework/References

- PPS7: Sustainable Development in Rural Areas (2004)
- North West Regional Spatial Strategy (RSS) Policy W6 (2008)
- Cumbria and the Lake District Joint Structure Plan Policy EM16 (2006)
- Copeland Local Plan Policies TSM 1-6 (2006)

Visitor Accommodation and Camp Sites

- 9.2.25 In support of the strategic policy for tourism in Policy ER10, this policy sets out a detailed approach towards the provision of visitor accommodation and camp sites. In this context, the policy considers visitor accommodation to include hotels, apartment hotels, guest houses, bed and breakfast establishments, caravans, chalets and beach-chalets.

Policy DM9 – Visitor Accommodation

Proposals for new or improved visitor accommodation in the Borough will be supported subject to compliance with the principles of sustainable design outlined in ST1 and ER10 and so long as their scale and character are appropriate to the location and setting.

Additionally, proposals for rural holiday homes, caravans, chalets, camping sites and beach-chalets will only be permitted where:

- A Proposals for rural holiday homes involve the conversion of existing buildings which are proven not to be suitable for other uses, in accordance with the tests proposed in Policy DM16. The new build or extension of buildings to provide such accommodation will not be permitted**
- B Proposals for new holiday caravans, chalets and/or camping sites or extensions to existing sites have adequate access arrangements and possesses a high level of natural screening which, where necessary, is capable of reinforcement and extension**
- C New beach-chalets are replacement only, are developed on the existing footprint and match the character of the replaced chalet**

Any permitted developments will be subject to occupancy conditions or legal agreements which restrict any new visitor accommodation for holiday use only.

Proposals for the storage of caravans will only be permitted if the proposal site is well-screened all year round and is well related to a settlement or building group without significant threat to the living conditions of nearby residents.

Reasoning and Choice of Preferred Option

- 9.2.26 When considering proposals for new visitor accommodation regard should be given to landscape character assessment work, setting of the National Park, the Heritage Coast and views to and from it, the undeveloped coast, nature conservation assets and heritage assets.
- 9.2.27 The development of caravan, chalet and / or camping sites has expanded in coastal locations where landscaping is difficult to establish and has also tended to include a sizable residential quota which have proved not to be entirely satisfactory. Given the potential pressures from tourism on caravan chalet and/or camping sites or their extensions, it is considered appropriate to set out relevant management principles in this policy.

Key Policy Context/Framework/References

- PPS7: Sustainable Development in Rural Areas (2004)
- Cumbria and the Lake District Joint Structure Plan Policy EM16 (2006)
- Copeland Local Plan Policies TSM 1-6 (2006)

5 Sustainable Settlements

5.1 Introduction

5.1.1 Housing is one of the key strategic spatial issues for Copeland.

- A legacy connected with the Borough's industrial past, of larger than average numbers of terraced and unattractive public sector homes, was met by inclusion of West Cumbria in the Housing Market Renewal programme, resources for which have now been drastically curtailed.
- Socio-economic and marketing assessments have repeatedly identified a shortage of 'executive' quality housing, resulting in the socially mobile looking for homes outside the Borough and acting as a potential disincentive to inward investment. Rectifying this is an aim of the Energy Coast Master Plan.
- It is thus a guiding strategic principle in the Borough, expressed in its Housing Strategy (based on housing market assessment) as well as the ECMP and this Core Strategy, that the range and quality of the Borough's housing stock, and thus the balance of the local housing market, be improved.

5.2 Improving the Housing Offer

5.2.1 The strategic development principles set out in Policy ST1 focus on improving the whole housing offer in the Borough. Policy for sustainable settlements thus has the following three distinct but connected aspects:

- promoting a better, more balanced housing 'offer' through continued renewal as well as the encouragement of 'aspirational' and 'executive' housing;
- providing, in a sustainable way, the right quantity and quality of land not only to meet identified needs but also to allow for growth; and
- making sure that planning policy helps to meet the needs of the whole community.

5.2.2 Detailed components for dealing with quality of place, sustainable development principles and standards for amenity are set out later in Policies for Development Management (Chapter 9, Policies DM10 to DM21).

Policy SS1 – Improving the Housing Offer

The Council will work to make Copeland a more attractive place to build homes and to live in them, by:

- A Allocating housing sites to meet local needs in locations attractive to house builders and requiring new development to be designed and built to a high standard**
- B Promoting the renovation and improvement of the Borough's existing housing stock, and the enhancement of the surrounding residential environment, to meet local housing needs, particularly in Whitehaven, the three smaller towns, and Local Centres**
- C Considering further partnership and funding options (in consultation with local communities) for demolition and redevelopment schemes in areas of low demand or where the stock does not meet local housing market needs. This will include the continuation of previous Furness and West Cumbria Housing Market Renewal schemes.**

5.2.3 **Standard of New Housing:** Copeland must set high standards and targets in design and build of new housing to improve the quality of our future housing. In keeping with Sustainable Community Strategy aims and Core Strategy Objective 9, the quality of new homes will be regulated with regard to the principles established for Place Quality in Policy DM10, Sustainable Development Standards in Policy DM11, and Standards for New Residential Developments in Policy DM12.

5.2.4 The Council is mindful that there is support for targets which go further than national standards in promoting sustainable construction. However, in view of the relatively weak market conditions that prevail in most of the Borough, and the fact of progress via the Building Regulations towards the highest standards of sustainability by 2016, it is not proposed that policy should go beyond Building Regulations standards, to minimise the risk of compromising development viability in areas needing increased house building. The Council will, however, encourage innovative design incorporating high standards of energy and water efficiency.

5.2.4 **Housing Stock Improvement and Renewal:** There remains local support at a variety of levels for an approach to renewal involving clearance and replacement. On its own, this would not deliver the improvements needed to deliver an improved housing offer. Therefore, a mixed approach will be pursued, where housing clearance, redevelopment, and improvements to the existing stock will complement the provision of new housing.

Key Policy Context/Framework/References

- Energy Coast Master Plan (ADD REFS)
- Copeland Housing Strategy (ADD REFS)
- PPS3: Housing (2006)
- North West Regional Spatial Strategy (RSS) Policies DP4 L3 (2008)
- Copeland Local Plan Policy HSG 12 (2006)

5.3 Sustainable Housing Growth

- 5.3.1 The Council must plan for housing growth over the plan period. The sustainable approach is to allocate sites for housing development in accessible locations, to set realistic annual housing supply targets, to optimise development densities and to ensure the development of as much brown field land as is feasible.

Policy SS2 – Sustainable Housing Growth

House building to meet the needs of the community and to accommodate growth will be provided for by:

- A Allocating sufficient land for new housing development to meet identified requirements within the Borough.**
- B Allocating land in accordance with the following housing targets:**
 - i) A baseline requirement, derived from projected household growth, of 230 dwellings per year**
 - ii) Provision for growth 30% above that, to 300 dwellings per year.**
- C Seeking densities of 30-40 dwellings per hectare, with detailed density requirements determined in relation to the character and sustainability of the surrounding area as well as design considerations.**
- D Seeking to achieve a minimum of 50% of new housing development on previously-developed 'brownfield' sites.**

- 5.3.2 The North West Regional Spatial Strategy set a target for Copeland of 230 dwellings per annum, based on an agreed approach for Cumbria which reflected the then current household projections. The Strategic Housing Market Assessment notes that the 2008-based Household Projections (DCLG based on Office for National Statistics population data) anticipate average growth of 320 households per annum over the period 2006-2031. County Council modelling suggests a lower figure of 116-167 per annum,

starting from a 'baseline scenario' assuming net job losses of 5,000. The Council does not consider it prudent to plan on the 'baseline' projection, given the Borough's history of work-based in-migration and the Energy Coast strategy of energy-based growth. On the basis of past market performance, to allow for 230 per year may appear ambitious, but represents a level of house building that is achievable if the local economy grows, and would indeed be necessary to accommodate it. (No allowance is made for unpredicted ('windfall') sites, but the history of development in the Borough suggests that this would make an additional contribution.)

- 5.3.3 The aspirations of the Energy Coast Master Plan have resulted in a number of scenarios, producing a range of housing growth possibilities some of which are well above anything that has been achieved in the recorded past. The Council considers that it would not be feasible to allocate land to reach the full range of what has been suggested. But the SHLAA demonstrates that it is feasible to find land to accommodate 300 dwellings per year over the Plan period, without needing to reassess objectives such as those relating to settlement distribution, landscape protection and the environment. 5.3.4 However, infrastructure considerations (in particular, drainage and water supply) mean that allowance for such growth will have to be phased into the later stages of the Plan period. This will be considered in greater detail in the Site Allocations Development Plan Document; the current assumption is that, for the foreseeable future and certainly for the first five years of the Plan period, 230 per annum is the most that it is realistic to provide for.
- 5.3.5 **Housing density:** national and regional targets for housing density have been done away with. However, the Council considers that it remains desirable, in the interest of efficient use of land and the protection of settlement character, to expect that most housing development will take place at 30 dwellings per hectare or more. Developments will be expected to achieve a significantly higher level than that in central Whitehaven, to reflect that town's urban character. Lower densities may be acceptable where justified by appraisals in Design Statements accompanying planning applications, for example in settlements or neighbourhoods which have an open character, where the dimensions of the site are not favourable to a compact layout, or where a density of 30 or higher would compromise the provision of executive housing.
- 5.3.6 **Brownfield development:** the target of at least 50% of new dwellings on 'brownfield' land is both appropriate and achievable. It also supports the Council's strategy to maximise the regeneration potential of previously-developed land and buildings in the most sustainable locations, such as Whitehaven. However, the SHLAA and viability assessments indicate that a figure of 25% to 35%, dependent on market conditions, is more realistic. The policy priorities of the Core Strategy, notably the general stress on urban regeneration and the specific targets in ST2, will ensure that maximising the take up of brownfield land remains high on the agenda.
- 5.3.7 Where brown field land, particularly on larger and urban fringe sites, has acquired biodiversity value, the Council will encourage the retention of

enough natural habitat to make a viable contribution to local green infrastructure in accordance with policies SS5 and ENV3.

Key Policy Context/Framework/References

- PPS3: Housing (2006)
- North West Regional Spatial Strategy (RSS) Policies DP4 L3 - L4 & Table 7.1 (2008)
- Britain's Energy Coast: A Masterplan for West Cumbria (2008)
- Strategic Housing Market Assessment (2011)
- Strategic Housing Land Availability Assessment (First Sieve Report, November 2009, final report, 2011)

5.4 Housing Needs, Mix and Affordability

5.4.1 Copeland's vision for housing is

1. a balanced mix of housing types, sizes and tenure;
2. attractive, safe and sustainable neighbourhoods;
3. support for economic development and regeneration objectives.

5.4.2 Providing a mix of high quality housing to meet people's needs and aspirations is a key element in reducing outward migration levels as well as stabilising and then increasing the Borough's resident population.

5.4.3 The Strategic Housing Market Assessment (SHMA) (2011) highlights a general lack of choice with the current stock, and a need for family homes and for housing to accommodate the ageing population. It also notes that housing is less affordable now compared to 2006, and that there is a need for a greater supply of good quality medium-density housing, as well as modern 'executive' housing. It suggests that this lack of affordable and executive housing may be a barrier to sustainability and investment in the Borough.

Policy SS3 – Housing Needs, Mix and Affordability

Applications for housing development should demonstrate how the proposal helps to deliver a range and choice of good quality and affordable homes for everyone.

A Development proposals will be assessed according to how well they meet the identified needs and aspirations of the Borough's individual

Housing Market Areas as set out in the Strategic Housing Market Assessment, by:

- i Creating a more balanced mix of housing types and tenure within that market area, in line with the evidence provided in the SHMA.**
- ii Including a proportion of affordable housing which makes the maximum contribution (consistent with maintaining the viability of the development) to meeting identified needs in that market area.**
- iii Establishing a supply of sites suitable for executive and high quality family housing, focusing on Whitehaven and its fringes as a priority and also giving particular attention to the three smaller towns.**
- iv Ensuring that housing meets special needs, for example those of older people, where there is a genuine and proven need and demand in a particular locality.**
- v Providing housing for specific groups where there is housing need, including temporary workforce, agricultural workers and key workers**
- B The Council will continue to operate a Rural Exception Site policy approach in rural areas outside the Key Service Centres and Local Centres to provide affordable housing that meets an identified local need and will be secured to meet that need in perpetuity.**
- C The Council will work with neighbouring authorities to meet any need for gypsy and travellers sites and to provide greater choice for these people. (Please see DM20 for further detail).**

5.4.4 Housing mix. The mix of housing in a development should be informed by an assessment of the housing needs of the locality. The Council will not seek to impose a standardised mix, but developers may be required to provide evidential justification for proposals which do not seek to address identified local needs for particular types of housing. The SHMA indicates unsatisfied demand for:

- larger (especially four bedroom) houses in the north of the Borough;
- smaller (one or two bedroom) homes in mid and south Copeland;
- detached houses across the Borough;
- bungalows in Whitehaven and Egremont.

5.4.5 Affordable Housing. The approach to meeting needs for affordable housing will be based on the conclusions of the SHMA. This indicates a need for 153 affordable dwellings per annum; but, assuming that the market is unlikely to provide enough dwellings for that need to be met via planning obligations, recommends that a quota of 15-25% be sought, subject to development viability and local market variation across the Borough. The evidence indicates that a split of 60% for rent, 40% equity share would be appropriate. It is proposed to adopt targets reflecting

these characteristics, which will be set out in more detail in a further Local Development Document.

5.4.6 Rural Exceptions. The Council will consider favourably proposals for affordable housing in villages to meet the needs of the local community and fulfil the following requirements:

- i. a site that is within or immediately adjoins the village and is well related to its built form in terms of scale and character
- ii. supported by evidence to show need for the development in the local community (usually parish and adjoining parishes) or that an individual applicant has genuine local ties to the village and genuine affordability needs
- iii. subject to a planning obligation that requires occupation of the dwelling(s) in perpetuity only by households with these same local connections and affordability issues

5.4.7 Exceptionally, consent may be given to homes in open countryside fulfilling the above requirements and where it can be demonstrated that a location outside a settlement is essential.

5.4.8 Gypsies and Travellers: the Cumbria Gypsy and Traveller Accommodation Assessment (GTAA) identified a need for one residential pitch within Copeland, while the partial review of the RSS suggests a need for zero residential pitches and five transit pitches for Gypsies and Travellers in the Borough over the next ten years. However, the figures for the RSS are given in multiples of five and as a result the Council, in partnership with other councils in Cumbria, is commissioning further work to determine specific local needs of Gypsies and Travellers together with mechanisms to provide sites to meet any needs that are identified. In this way the Council will continue to work with the neighbouring authorities to meet any need for gypsy / traveller sites and to provide greater choice.

Key Policy Context/Framework/References

- PPS3: Housing
- North West Regional Spatial Strategy Policies L4 and L5 (2008)
- Submitted Draft North West Plan (RSS) Partial Review (2009)
- Cumbria Gypsy and Traveller Accommodation Assessment (2008)
- Cumbria and the Lake District Joint Structure Plan Policy H19 (2006)
- Interim Strategic Housing Market Assessment for Copeland (2009)
- Copeland Local Plan Policies HSG9, HSG11, HSG26 and HSG27 (2006)

5.5 Community Facilities and Services

5.5.1 In order for communities to be successful it is vital that they are well served by a full range of public, private, community and voluntary services. Facilities must be appropriate to people's needs, affordable, accessible to all, and available locally. This reduces the need for people to travel to obtain essential services, particularly benefiting the less mobile and more deprived members of society.

5.5.2 For the purpose of this Core Strategy, 'community facilities and services' include the following:

- Education: primary, secondary, further and higher
- Health: primary care and acute services
- Information: libraries, museums and arts / cultural services
- Social services: children, young people, families, elderly, learning and physical disabilities, mental health
- Community: halls, meeting rooms, even public houses and churches, chapels, mosques etc.
- Post Offices and shops
- Leisure: playing fields and sports pitches, play areas, allotments and informal open space accessible to the public, (covered also by Policy SS5, sports and leisure centres
- Emergency Services: police, fire, ambulance

Policy SS4 – Community Facilities and Services

The range of services and facilities serving the Borough's communities will be protected by:

- A Encouraging the provision and retention of good quality services and facilities which meet the needs of local communities and are accessible by public transport, cycling or on foot. Services and facilities which benefit the less mobile or more deprived members of the community and which maximise opportunities for people to improve their health and well being, will be given particular support.**
- B Ensuring that needs are met in the most appropriate, effective and accessible way, by**
- i) locating widely used services and facilities in Whitehaven and the three smaller towns**

- ii) increasing provision of local community facilities, such as community centres and public open space, in Local Centres and villages identified as needing them
 - iii) improving the number and quality of facilities in areas of the Borough which exhibit higher than average levels of socio-economic deprivation – especially as regards health care, sports and fitness facilities where healthy living is an issue
 - iv) providing specifically for the leisure and recreational needs of older people
- C Guarding against the loss of land or buildings belonging to existing community facilities in all locations by:**
- i) wherever possible ensuring sites are retained for other forms of community use
 - ii) ensuring that satisfactory alternative provision is made where proposals for development will result in the justifiable loss of an existing service or facility, in accordance with Policy DM21
- D Allowing for the expansion and / or enhancement of existing community facilities to assist continuing viability, particularly in areas where new development will increase the demand for facilities**
- E Where development proposals are likely to increase demand for certain community facilities and services the Council will expect developers to contribute to their provision, enlargement, improvement or enhanced maintenance, in accordance with Policy ST4 and Local Development Documents relating to infrastructure provision**

5.5.3 Location of Community Facilities One of the key priorities for the Council is ensuring that the right level and quality of services and facilities is provided in each of the settlements across the Borough. Ensuring that there are facilities of a scale appropriate to the type and size of settlement, with higher level services located in Whitehaven, Millom, Cleator Moor and Egremont. This is considered to be the most sustainable option to ensure that needs are met in the most effective and accessible way.

5.5.4 The policy acknowledges that additional local services and facilities will be required within the Local Centres and villages. This should reduce the need to travel for key essential services, and improve the quality of life of residents within these areas.

5.5.5 Community Facilities & Services for Specific Groups: consultation responses have identified two priorities.

- the leisure and recreational needs of older people, for bowling greens, community gardens and allotments, and extra facilities for adult education, should be a specific consideration.
- health and well-being should also be improved through for example providing better quality open spaces, public sports halls, car-free

routes for cycling and walking, provision of allotments and an accessible network of health facilities.

Open space has an additional dimension as a component of green infrastructure, and this is covered in strategic terms in Policy SS5.

- 5.5.6 **Protection of Community Facilities & Services:** There has been wide support for the principle of protecting facilities in all locations, from development pressures, and that land or buildings belonging to or providing community facilities should be protected from pressure from competing uses unless there is no demand, or sufficient alternative provision.

Key Policy Context/Framework/References

- Planning for a Sustainable Future: White Paper (2007)
- Circular 05/2005: Planning Obligations (2005)
- PPS1: Delivering Sustainable Development
- North West Regional Spatial Strategy Policy EM1 (2008)
- Copeland Local Plan Policies SVC1-15 (2006)
- Draft National Planning Policy Framework

5.6 Green infrastructure

- 5.6.1 As well as Copeland's unbeatable wealth of countryside, its towns and villages have important areas of green space within their boundaries which provide opportunities for passive or sporting recreation, habitats for wildlife, and a positive contribution to the character of towns and villages. The Council is committed to protect and enhance such assets for the enjoyment of residents and visitors alike, together with the routes which connect them including footpaths, green-ways and cycleways.
- 5.6.2 'Green infrastructure' refers to the concept of developing a network of green spaces and other environmental features, including parks, open spaces (including small urban areas planted with trees), playing fields, woodlands and allotments, connected where possible to the countryside via routes such as footpaths and cycleways functioning as 'wildlife corridors'. In principle it also includes private spaces such as gardens, though this policy does not seek to exert control over them other than through the normal use of development management powers.
- 5.6.3 Green infrastructure has a dual role. In terms of settlement sustainability, it enhances the quality of life by including a framework of open spaces of a range of sizes and purposes, which make places more attractive and promote better mental and physical health. Additionally, it can be managed to maintain and create wildlife habitats and corridors linking them, which promotes biodiversity. This aspect is dealt with under policy for the environment (ENV3).

Policy SS5 – Provision and Access to Open Space and Green Infrastructure

Adequate provision and access to open space, and the development of the Borough's green infrastructure, will be promoted by:

- A Protecting against the loss of designated open space (including playing fields, play areas and allotments) within settlements, and of the access routes or wildlife corridors which connect them, whilst ensuring also that they are well maintained. Where it is necessary to build on land covered by this policy, equivalent replacement provision should be made.**
- B Setting minimum open space standards for new development in accordance with Policy DM25**
- C Promoting the establishment, improvement and protection of green infrastructure networks connecting open spaces with each other and with the countryside.**

- 5.6.4 An audit has been carried out in accordance with national guidance in PPG17. This has assessed the Borough's recreational assets against national standards, in some cases modified to suit local conditions. Shortfalls are identified in the Strategy for Infrastructure, which will inform future development and expansion of these assets, and be the base for developing an approach to funding improvements via developer contributions or the Community infrastructure Levy, under the auspices of policy ST4. In implementing these policies the Council will also be mindful of Natural England's Accessible Natural Greenspace Standards and will seek, wherever feasible, to improve Copeland's performance in meeting them.
- 5.6.5 The Council may, in pursuing the aims of this policy, adopt standards which vary from national norms in order to respond to the needs of the people of Copeland. Any such variance will be published, and consulted on, in a Local Development Document.
- 5.6.6 Policy SS5 will support the protection of existing facilities such as sports pitches, parks, play areas and allotments, which will be designated in the Site Allocations DPD and Proposals Map. The Council will expect that new development plays its part in improving the extent, quality and accessibility of green space. This approach is complementary to that relating to other community facilities in policy SS4. The Council's proposed requirements for open space and landscaping are set out in Preferred Options Policy DM25.

Key Policy Context/Framework/References

- PPG17 Planning for Open Space, Sport and Recreation (2002)
- North West Regional Spatial Strategy Policy EM1 (2008)
- Copeland Open Space Audit (2011)

9

9.1

9.2

9.3 Development Management for Sustainable Settlements

9.3.1 The policies in this group deal with the response to a range of activities in the housing and settlements topic area. They deal in turn with:

Achieving quality of place (DM10)

Sustainable development standards (DM11)

Standards for new residential development (DM12)

Residential conversions in the Borough's settlements (DM13)

Residential institutions (DM14)

Residential conversions in rural areas (DM15)

Replacement Dwellings (DM16)

Removal of occupancy conditions (DM17)

Domestic extensions and alterations (DM18)

Residential caravans, mobile homes, etc (DM19)

Sites for Gypsies and Travellers (DM20)

Protecting community facilities (DM21)

Achieving Quality of Place in New Development

9.3.2 One of the Council's key spatial principles in Policy ST1 is to ensure that development in the Borough creates good quality places. This Policy sets out the detailed approach, with principles for the mix and layout of developments that the Council wishes to encourage. It complements other policies which focus on detailed requirements for accessibility (Policy DM22), sustainable development standards (Policy DM11).

9.3.3 For housing development, the requirements of this policy are also relevant to improving the housing of the Borough in Policy SS1, and are linked with further details for residential development which are set out in Policy DM12.

Policy DM10 – Achieving Quality of Place

The Council will encourage good design and 'quality places' by requiring development proposals to:

A Incorporate a complementary mix of uses, especially within or near town centres or at sites adjacent to public transport routes

- B Respond positively to the character of the site and the immediate and wider setting and enhance local distinctiveness through:**
 - i) An appropriate size and arrangement of development plots**
 - ii) The appropriate provision, orientation, proportion, scale and massing of buildings**
 - iii) Careful attention to the design of spaces between buildings**
 - iv) Careful selection and use of building materials which reflects local character and vernacular**
- C Incorporate existing features of interest including landscape, topography, local vernacular styles and building materials; and in doing so, have regard to the maintenance of biodiversity.**
- D Address vulnerability to and fear of crime and anti-social behaviour by ensuring that the design, location and layout of all new development creates:**
 - i) Clear distinctions between public and private spaces**
 - ii) Overlooked routes and spaces within and on the edges of development**
- E Create and maintain reasonable standards of general amenity**
- F Incorporate new works of art as part of development schemes.**

9.3.4 The purpose of this policy is to raise the quality of development, for better places to improve the image of Copeland as a place to live, work, visit and attract further investment. The principles, combined, go beyond the conventional approach of applying rigid standards, encouraging innovative thinking in development design. The aim is to move away from development which can be unsympathetic, bland, difficult to negotiate and make people less comfortable, to creating places which are attractive and useable. Circular 01/2006 requires most development proposals to be submitted with design and access statements. There are only a few exceptions where this requirement does not apply.

9.3.5 The Council will develop detailed design briefs for major allocations which will specify the detailed design issues that will need to be addressed. The Council intends to produce a Supplementary Planning Document to complement the design related principles in this policy and policies DM12 and DM22.

9.3.6 The Council will expect a Design and Access Statement submitted with applications to demonstrate how the proposals have taken good design principles into account, except where applications are for:

- Change of use of land and buildings, unless it involves operational development

- Alterations or improvements to individual dwellings which are not Listed Buildings or located in Conservation Areas

9.3.7 Where development costs total £500,000 or more, developers will be encouraged to devote at least 1% of those costs to a work(s) of art to be displayed within the development in an area accessible or visible to the general public, including people with impaired mobility. This subject will be covered in more detail in the Supplementary Planning Document on developer contributions and/or that on design.

Key Policy Context/Framework/References

- PPS1: Delivering Sustainable Development (2005)
- PPS6: Planning for Town Centres (2005)
- Circular 01/2006: Guidance on Changes to the Development Control System
- CABE: Building for Life Statements: How to write, read and use them.
- CABE: Building for Life: www.buildingforlife.org
- DCLG: Code for Sustainable Homes (2006)
- DfT & DCLG: Manual for Streets (2007)

Sustainable Development Standards

9.3.8 This policy sets out detailed requirements for sustainable development and construction in support of key principles in ST1 for reducing carbon emissions and increasing the energy efficiency of new development. It also includes requirements for on-site renewable energy generation to complement the wider approach towards renewable energy generation development in the Borough in Policies ST2 and ER2. The requirements set out in this policy apply to all new development proposals, except where thresholds are stipulated (such as for on-site renewable energy generation). These requirements also need to be balanced with those which are set out in Policy DM10 and other detailed standards for housing development, as set out in Policy DM12.

Policy DM11 – Sustainable Development Standards

The Council will ensure that development proposals reach high standards of sustainability by:

- A Requiring housing to be of an appropriate density – generally at least 30 dwellings per hectare. However, a lower density may be appropriate to reflect the form and character of an area the surroundings of individual developments**
- B Encouraging developers to achieve high energy efficiency standards in relation to the Code for Sustainable Homes and BREEAM**

- C Requiring renewable energy generating technology on site in developments of 10 or more dwellings or 1,000m² non-residential development**
- D Orientating and designing buildings to maximise solar gain, so far as practicable without compromising wider design and quality of place objectives**
- E Encouraging construction materials to be sourced, where possible, from local and sustainable sources of production**
- F Requiring water saving technology, including grey water recycling to be incorporated in all developments**
- G Ensuring surface water is managed appropriately, with the inclusion of sustainable drainage systems where possible**

Support will also be given to proposals for improvements or alterations to existing buildings that include measures to increase energy efficiency and incorporate renewable energy generation with regard to the standards in this policy.

- 9.3.9 This policy supports the agenda of the Energy Coast Masterplan and Cumbria Climate Change Action Plan.
- 9.3.10 It does not set specific targets under the Code for Sustainable Homes and BREEAM, consultation having revealed concern as to the danger that unilateral goals are likely, in a low house price area, to compromise development viability. Correspondingly, although the Council will encourage on-site renewable energy generation on larger developments, this will be regarded as a matter of optimising provision through negotiation, and no target is set. Provision of, or contributions to, off-site generation capacity may be accepted as an alternative.

Key Policy Context/Framework/References

- PPS1: Delivering Sustainable Development (2005)
- Building for Life: www.buildingforlife.org
- Code for Sustainable Homes (2006)
- BREEAM: www.breeam.org.uk

Standards for New Residential Developments

- 9.3.11 In support of Policies ST1 and SS1, this policy provides detailed requirements with regard to the standards of residential amenity which need to be achieved in new housing developments, in terms of parking standards, separation requirements, and open space provision. These are additional requirements to the wider place quality and sustainable

development standards which are set out in Policies DM10 and DM11 respectively.

Policy DM12 – Standards for New Residential Developments

Proposals for new residential developments should incorporate:

- A Car parking provision in accordance with adopted residential parking standards**
- B Minimum separation distances whereby:**
 - i) Detached and end of group dwellings retain at least 1.0m distance between dwellings walls and side boundaries**
 - ii) a minimum of 21.0m is retained between face elevations of dwellings containing windows of habitable rooms**
 - iii) a minimum of 12.0m is retained between face elevations of dwellings containing windows of habitable rooms and a gable or windowless elevation**
- C A minimum of 0.4ha of public space for every 200 dwellings pro-rata on developments of 10 or more dwellings, and in groups of family housing a minimum of 100m² of children's play space should be provided at the rate of one play space per 30/40 dwellings**
- D All new development should be designed to Lifetime Homes and (on developments of ten dwellings or more) Building for Life standards.**

- 9.3.12 This policy effectively carries forward Policy HSG8 of the Local Plan and is intended to maintain general standards of safety, privacy and open space. It is intended that these standards can be incorporated into a Supplementary Planning Document, which the Council aims to develop when its key LDF documents are in place

Key Policy Context/Framework/References

Building for Life: www.buildingforlife.org

Code for Sustainable Homes (2006)

Conversions of Buildings to Residential Use in the Borough's Settlements

- 9.3.13 This Policy complements objectives to improve the overall housing offer in Policy SS1.

Policy DM13 – Conversions of Buildings to Residential Use within Settlement Limits

Proposals for the conversion of suitable non-residential buildings or subdivisions of large houses to provide new residential accommodation will be permitted so long as:

- A Adequate internal space standards and exclusive use of kitchen and bathroom facilities can be achieved without extensive alterations or additions to the property**
- B Off street car parking is provided in accordance with parking standards**
- C Adequate external amenity space is provided**
- D The conversion works retain the character of the building**
- E No alterations or associated works create amenity problems for residents of adjacent properties**

Residential Establishments

- 9.3.14 This policy deals with either new or changes of use of existing building to residential institutions, including Houses in Multiple Occupation.

Policy DM14 – Residential Establishments

Proposals for new or changes of use to Class C2 uses will be permitted so long as:

- A In the case of a proposed new building they are of a scale, design and materials appropriate to the area**
- B In the case of any an existing property or extensions, alterations of external features such as fire escapes are of a scale, design and material which retain the character of the building and are compatible with its surroundings**
- C Off street car parking is provided in accordance with parking standards**
- D Adequate external amenity space is provided**
- E No extensions, alterations or associated works create amenity problems for residents of adjacent properties**

In primarily residential areas development for Class C2 uses and Houses in Multiple Occupation will be managed to prevent groups of such uses being formed to the detriment of general residential character and amenity.

Conversion of Rural Buildings to Residential Use

- 9.3.15 Reflecting Policy ST1 and the need to support economic development whilst protecting the Borough's key assets, this policy aims to manage development that involves the conversion of rural buildings to residential use.

Policy DM15 – Conversion of Rural Buildings to Residential Use

In rural areas proposals for the conversion of a building to residential use will be permitted so long as all of the following are fulfilled:

- A Applicants can demonstrate that alternative employment or mixed use live-work accommodation or community use is not viable**
- B Where the subject building is currently or last used for agriculture, applicants can also demonstrate that there is no alternative site or premises available in the locality within existing settlements**
- C The building is structurally sound and is capable of accepting conversion works without significant rebuilding, modifications or extensions**
- D The building in its existing form is of a traditional construction and appearance and the proposed conversion works conserve the essential character of the building and its surroundings. In this regard existing features of interest and external facing materials should as far as possible be retained.**
- E The building is located within or adjacent to a village or existing group of buildings**
- F The building is served by a satisfactory access from the public highway network without the requirement for extensive private roads or tracks and domestic services such as water supply and electricity must be readily available to the site**
- G The conversion works incorporate reasonable standards of amenity**
- H The number of dwellings proposed is appropriate to the scale of adjoining development and will not substantially increase the number of dwellings in the countryside**

- 9.3.16 This criteria-based policy is designed to ensure that applicants, in proposing conversions to residential use, demonstrate that the proposed conversion is the best, most sustainable option. Proposals for conversions of agricultural buildings would also be required to include evidence that there are no alternative brownfield sites available in the locality. This is because development of this kind is treated as if it were greenfield development.

Key Policy Context/Framework/References

PPS1: Delivering Sustainable Development (2005)

PPS7: Sustainable Development in Rural Areas (2004)

North West Regional Spatial Strategy (RSS) Policy RDF2 (2008)

Replacement Dwellings

Policy DM16 – Replacement Dwellings

The replacement of existing dwellings will be permitted except where the dwelling is:

- A** Listed as a Building of Special Architectural or Historic Interest or is in making a positive contribution to the character of a Conservation Area or is
- B** In the countryside (i.e. outside the settlement boundaries prescribed in the Sites Allocations DPD (and referenced in Core Strategy Preferred Options Policy ST2) and
 - i) is the result of a temporary or series of temporary permissions, or
 - ii) its replacement would be in serious conflict with public health or safety, the economy of public services, or the appearance or potential for improvement of the countryside or
 - iii) is derelict (i.e. incapable of being re-inhabited without carrying out works requiring planning permission), or
 - iv) is no longer in existence (unless the dwelling has been accidentally destroyed in the recent past, for example by fire or flood, and was occupied at the time of the accident) or
 - v) is the habitat of wildlife species protected by law when expert advice must be sought to establish an appropriate course of action.

So long as the scale and character of the replacement dwelling matches that which it is proposed to replace.

- 9.3.17 Policy ST2 sets out a general presumption against development in the countryside unless there are exceptional reasons. One instance where an exception could be made is noted in Core Strategy Policy ST2C(v) and this is for the replacement of an existing dwelling. There have to be criteria to test whether a proposal is genuine and to ensure that the development does not create health and safety or other problems. The reference to Listed Buildings and buildings in Conservation Areas is for clarification purposes and relates to all locations.

Removal of Occupancy Conditions

- 9.3.18 This policy complements the proposed Spatial Development Strategy (Policy ST2) and to reinforce the policy approaches set out in Preferred Options Policies DM10 and DM16.

Policy DM17 – Removal of Occupancy Conditions

Planning permission for the removal of occupancy conditions will only be granted where it can be demonstrated that there is no longer a need for housing for the particular group that the occupancy relates to within the local housing market area.

Where removal of the original condition is justified, applicants would be required to demonstrate that the property is not suitable for meeting other housing needs within the local housing market.

- 9.3.19 There is a need for policy to deal with proposals to remove or alter occupancy conditions as the need for housing accommodation changes. This policy therefore proposes to deal with the removal of occupancy conditions whilst taking into account the changing housing needs in the Borough.
- 9.3.20 Where applicants seek to have occupancy conditions removed the Council will expect the applicant to demonstrate that there is no longer a housing need for the property that the occupancy condition relates to. As part of that process the applicant will be expected to demonstrate evidence that the property has been marketed for a reasonable period of time at a reasonable value.
- 9.3.21 The Council will wish to ensure that all housing needs arising from local economic and social circumstances are examined which could be met by the subject property without the need for alternative new building. A property, for example that is no longer needed to house a local agricultural worker, may alternatively prove to be essential for meeting the need of a local household who otherwise may be priced out of the local market.

Key Policy Context/Framework/References

PPS3: Housing (2006)

North West Regional Spatial Strategy (RSS) Policy L5 (2008)

Interim Strategic Housing Market Assessments for Copeland (2009)

Domestic Extensions and Alterations

- 9.3.22 This policy seeks to ensure that any proposals for domestic extensions or alterations meet detailed requirements of design and amenity.

Policy DM18 – Domestic Extensions and Alterations

Proposals for extensions or alterations to existing dwellings will be permitted so long as:

- A The scale, design and choice of materials involved respect the character of the parent property with the use of pitched roofs where practicable**
- B They would not lead to a significant reduction in daylighting available to either the parent property or adjacent dwellings**
- C They would not create potential noise nuisance, security or privacy or overlooking problems for residents of either the parent property or adjacent dwellings**
- D They would not result in a loss of 50% or more of the undeveloped curtilage of the parent property**

Proposals which involve listed buildings or properties within conservation areas must also meet the requirements of Policies ENV4 and DM26.

This policy does not apply to the alteration or extension of beach bungalows, which will not be permitted.

- 9.3.23 It should be noted that the Council will also be mindful of the criteria highlighted in DM12 when considering domestic extensions and alterations. Further guidance may be provided by a Supplementary Planning Document.

Key Policy Context/Framework/References

PPS1: Delivering Sustainable Development (2005)

Residential Caravans, Mobile Homes, Chalets and Beach Bungalows

- 9.3.24 Copeland's extensive coastline and general attractiveness for low intensity tourism mean that it remains desirable to continue established approaches to deal with forms of residential development which can have a detrimental effect on the countryside and the surroundings of settlements

Policy DM19 – Residential Caravans, Mobile Homes, Chalets, and Beach Bungalows

The Council will not permit any new caravans, mobile homes, chalets, or beach bungalows for residential use, except where:

- A Permanent residential chalets are intended to replace existing residential caravans on sites of more than 10 residential caravans**
- B Individual caravans or residential mobile homes are proposed for a dependant relative or as temporary accommodation to support the establishment of a new rural enterprise**

9.3.25 Whilst caravans and other non-permanent residences may be acceptable in certain circumstances, beach bungalows are considered to be undesirable development in principle, by virtue of, firstly, their unsustainable location on the otherwise undeveloped coast and secondly, their potential vulnerability to the effects of coastal change. Any proposals to build them, or for measures designed to prolong or enhance their use, are unacceptable.

Sites for Gypsies and Travellers

Policy DM20 – Gypsies and Travellers

Proposals for sites to accommodate Gypsies and Travellers will only be permitted when the following criteria are met:

- A There is a demonstrable need for a site**
- B Sites are not located within or adjoining St Bees Heritage Coast, areas of Landscape Importance, areas of nature conservation interest, Conservation Areas or in the vicinity of Listed Buildings or Scheduled Ancient Monuments, where such development would have an adverse impact on the local landscape or undeveloped coast**
- C The site is well related to an existing settlement and the main highway network**
- D It incorporates appropriate access and parking arrangements**
- E The site has reasonable access to community services**
- F It does not adversely affect the amenity of adjacent occupiers**

9.3.26 The Council has a duty to provide for gypsies and travellers in appropriate locations. The criteria within the Preferred Options Policy are designed to ensure that any site(s) for Gypsies and Travellers will meet

an identified need, are well connected and do not unacceptably affect the local environment.

Key Policy Context/Framework/References

Circular 01/06 Planning for Gypsy and Traveller Caravan Sites (2006)

RSS Partial Review Consultation (2009)

Protecting Community Facilities

9.3.27 This Policy reinforces the support given to the provision of essential shops and services set out in Core Strategy Policies ER7, ER9 and SS4.

Policy DM21 – Protecting Community Facilities

Development or change of use which would result in the loss of an existing social or community facility will be resisted where it is satisfied that there is a demand for that facility that is unlikely to be met elsewhere.

9.3.28 The policy aims to protect facilities in all rural locations. The alternative option to apply protection, only in settlements which are Key or Local Service Centres was rejected, as it is recognised that there are many services outside these settlements that provide a vital role and could be vulnerable to pressures for changes to other uses.

National Planning Policy Framework: Draft Response from Cumbrian Planning Authorities

Please note that this is still an early draft and may be subject to change

General Comments

1 Policy Questions

1a Delivering sustainable development

The framework has the right approach to establishing and defining the presumption in favour of sustainable development.

Do you: Strongly Agree/Agree/Neither Agree or Disagree/Disagree/Strongly Disagree

1b Further Comments

The presumption in favour of sustainable development suggests a system which does everything it can to promote growth. It suggests that development should be supported unless the adverse impacts of allowing development would significantly and demonstrably outweigh the benefits. Although there seems to be a very strong pro development emphasis, it is silent, absent or indeterminate on the question as to when development should not take place.

Concern is raised that decision-takers at every level should assume that the default answer to development proposals is "yes", except where this would compromise the key sustainable development principles set out in the Framework.

The policies in the Framework need to be consistent to be considered as a whole but this difficult as it seems to lose its consistent thread and there are inconsistencies between topic areas.

Sustainable development is poorly defined, this needs to be appropriately and consistently defined within the overall defining principles so the document can be read as a whole. Definition of sustainable development has economic sustainability to the fore, the only strong negative of what is not sustainable is development which is likely to have a significant effect on sites protected under the Birds and Habitats Directive. Precise definitions are required to enable clear planning decisions. Imprecise definitions will result in an increasing number of decisions being challenged in the courts.

There is no suggestion of clearly identifying in development plans appropriate scales of development suitable for the hierarchy of settlements. Whilst there is suggestion that policies should enable the reuse of existing resources such as through the conversion of existing buildings, no mention is made of the reuse of previously developed land. This clearly will have implications for the regeneration potential of towns and cities.

Clarity is needed on the location and scale of development to provide greater certainty. For example development that attracts or accommodates a large number of people should be

located where there is access to key services and facilities and where there are accessible transport links.

There is a real threat that developers may use the 'presumption in favour of sustainable development' to target authorities with out-of-date plans where there is a perceived idea that it will be easier to get development granted. This could potentially lead to the situation where some authorities may choose not to prepare a plan. Authorities will have the choice to plan or leave it to the Market.

Without a strategic and coherent approach to sustainable development there is a risk of unsustainable development being promoted e.g. development at motorway junctions, piecemeal development, development un co-ordinated with infrastructure provision. There is also a risk of conflict between the growth agenda and community aspirations in rural areas.

2a Plan-making

The Framework has clarified the tests of soundness, and introduces a useful additional test to ensure local plans are positively prepared to meet objectively assessed need and infrastructure requirements.

Do you: Strongly Agree/Agree/Neither Agree or Disagree/Disagree/Strongly Disagree

2b Further Comments

There is a lack of clarity and consistent approach to the terminology for plans. The use of the term 'Local Plan' using capital letters throughout the NPPF is confusing as there is no such phrase in legislation other than in respect of saved local plans and it is not defined in the NPPF glossary. Para 21 then uses the legal defined term of development plan documents and also the phrase "additional" which suggests that the Local Plan is a single document rather than a straight replacement term for the collective term LDFs. The role and relationship of additional development plan documents isn't clear.

Para 20 is confusing. Plans should be "*prepared on the basis that objectively assessed development needs should be met unless the adverse impacts of doing so would significantly and demonstrably outweigh the benefits, when assessed against the policies in this Framework taken as a whole.*" Does this suggest that LPA's could refuse to meet these needs at the plan making level?

It is felt that significant value can be placed on the production of SPDs. If prospective developers follow the guidance they are more likely to be granted planning permission, avoid problems with the Equality Act and/or building regulations etc. SPDs and their predecessors SPGs have a proven record of improving understanding and standards, as the government clearly recognise in the recent letter of 12 August 2011 pointing to the usefulness of shop front SPDs. The reduced emphasis on the production of SPDs will mean additional policy guidance and text in DPDs which runs counter to the Core planning principle of para 19 that local plans should be "*succinct*".

Whilst it is debatable whether a plan could possibly be '*aspirational*' whilst also being '*realistic*'. In any event, the 'Effective' test of soundness which requires it to be deliverable (para 28) prevents true aspiration and is likely to be even more difficult to meet given the withdrawal and uncertainties of public funding and resources.

Does the advice that "*only policies that provide a clear indication of how a decision maker should react to a development proposal should be included in the plan.*" signal a move away

from spatial planning to pure development management policies and how does this address the "spatial implications of economic, social and environmental change" referred to?

Para 26 refer to plans being 'up to date'. The wording in this para is different to that in para 14 bullet 3 which refers where a plan is 'absent, silent, indeterminate or where relevant policies are out of date. The wording should be consistent.

Questions over the status of existing local plans once the NPPF is introduced. The NPPF will not have the same detail or previous PPG/PPSs, so if existing plans are not ruled in compliance and a planning application is judged against the NPPF this could lead to damaging development to be allowed until certificates of conformity are approved.

Para 27 refers to the need to ensure that the Local Plan is based on adequate up to date and relevant evidence. It is recognised that the collection and monitoring of data and evidence is invaluable to policy making and managing projects at a strategic and local level. However it is important to note that evidence gathering can have substantial resources implications. If this issue is not addressed this will continue and will no doubt be exacerbated by the abolition of RS (RSS) and the regional evidence base produced by the former Regional Assemblies and Development Agencies.

In respect of the preparation of SHMAs clarity is required to the boundaries of housing market areas be defined in the light of the abolition of RS (RSS) and the regional evidence base produced by the Regional Assemblies?

We note the use of the phrase 'likely to require' and the following phrases:

"- meets household and population projections, taking account of migration and demographic change"

"- addresses the need for all types of housing including affordable housing and the needs of different groups in the community (such as families with children, older people, disabled people, service families and people wishing to build their own homes)" - do they mean self build or individually commissioned designs?

"- caters for housing demand and the scale of housing supply necessary to meet this demand"

This latter point is wholly contradictory, not only to the points above but phrasing elsewhere in this section and thought the NPPF which uses need and requirements and sometimes objectively assessed need.

Is it demand numerically or in terms of type and location - what happens to objectively assessed requirements and need and what happens if demand cannot be met in a sustainable way.

Reference should be made to the use of guidance to prepare SHLAAs. Confirmation is required as to whether this will require updating. Confirmation is also required as to whether the guidance on the preparation of sustainability appraisals of the plan preparation process will be retained and updated.

In respect of examining development plans, some form of post-examination modification procedure needs to be introduced. It is unlikely that the majority of development plans have been found sound without an inspector making significant changes to ensure soundness.

Clarity is required as to how the additional housing in neighbourhood plans (which don't exist at present) relate to the SHMA/SHLAA assessments done for the local plan and also the housing trajectory.

This advice in para 52 is in conflict with the Act (Section 38(5)) which gives the most recent plan precedence not a neighbourhood plan - would an older neighbourhood plan take precedence over a newer local plan say updated to be consistent with national policy?

2c Joint Working

The policies for planning strategically across local boundaries provide a clear framework and enough flexibility for councils and other bodies to work together effectively.

Do you: Strongly Agree/Agree/Neither Agree or Disagree/Disagree/Strongly Disagree

2d Further Comments

With the removal of the higher level of statutory planning policy framework there is a need for a greater onus on joint working and the preparation of shared evidence and assessment to enable the development of cross border strategic policy.

It is noted that whilst the Localism Bill proposes the abolition of Regional Strategies, the provisions of section 62 of the 2004 Planning and Compulsory Purchase Act 2004 would remain; these require development plan documents to have regard to the Community Strategy, which in the case of Cumbria includes policy contained in the Sub Regional Spatial Strategy (SRSpS) (2008 -2028). The SRSpS provides a strategic and sustainable approach to larger than local planning issues across a number of authorities.

In Cumbria, the planning and housing authorities have a longstanding of joint working demonstrated through the creation of the Cumbria Planning Group and the Cumbria Housing Group.

A number of joint projects have been undertaken across the county including the publication of a countywide SHMA. The Cumbrian authorities have also carried out a renewable energy and low carbon capacity assessment to inform the production of the district's local planning policy.

The duty to co-operate will also be important for strategic working following the abolition of Regional Strategies. However further guidance is required as to how the duty will operate and the type of framework that may be used to guide and inform the operation of the duty's operation. Further clarity is required on the extent of cooperation required, or the consequence of inadequate cooperation which could arise in the case of potentially contentious issues relation to matters such as housing numbers and distribution.

3a Decision Making

In the policies on development management, the level of detail is appropriate.
Do you: Strongly Agree/Agree/Neither Agree or Disagree/Disagree/Strongly Disagree

3b Further Comments

(Mark could you provide some comment here please?)

The role of Development Management in sustainable development changes in paragraphs: 53 (fostering role), 54 (actively promote) and 55 (deliver enhanced levels).

The NPPF seems to have an interchangeable term for 'Local Plan'

Paragraph 59 – what about the national validation requirements? Are these going to change in light of the NPPF?

Paragraph 62 – badly written and doesn't fit in with Section 38 (6) of the Act

Paragraph 70 – do we need a viability test from the developer to justify conditions? If a developer says that the conditions are not viable, then permission should be refused as then the development would not be considered acceptable

4a Any guidance needed to support the new framework should be light-touch and could be provided by organisations outside Government.

Do you: Strongly Agree/Agree/Neither Agree or Disagree/Disagree/Strongly Disagree

4b What should any separate guidance cover and who is best placed to provide it?

5a Business and economic development

The 'planning for business' policies will encourage economic activity and give business the certainty and confidence to invest.

Do you: Strongly Agree/Agree/Neither Agree or Disagree/Disagree/Strongly Disagree

5b Further Comments

Para 73, '*investment in business should not be over-burdened by the combined requirements of planning policy expectations*'; this is a contradiction with current practice and the emphasis on the use of validation lists.

There is a lack of a broad definition of economic development. It should apply to development which provides employment opportunities, generates wealth or produces or generates an economic output or product.

Whilst the draft NPPF states that development plans should identify *strategic sites* for local and inward investment it fails to recognise the importance of seeking to secure an effective supply and range of good quality serviced employment sites in the right locations to meet demand. It is important that land is brought forward in a planned way and that opportunities for employment relate to the requirement for new housing.

Para 75 indicates that policies should avoid the long term protection of employment land and floorspace. Allocating a site is an act of long term protection in itself.

There is no reference to tourism development. The tourism industry makes an important contribution to Cumbria's economy. It generates an annual income of £2 billion to the Cumbrian economy and supports 38,860 FTE jobs. Annual visitor numbers are in the region of 40.8 million (Steam Report 2009, commissioned by Cumbria Tourism). Policy is required which ensures tourism is developed in a sustainable manner and should not prejudice

enjoyment and understanding of an area's distinctive environment, culture and history. There is also no mention of the night time economy.

It is welcomed that the draft NPPF highlights that policies should support sustainable economic growth in rural areas by taking a positive approach to new development. However it is very brief and does not talk about the conversion or reuse of appropriate existing buildings or the scale of development that would be appropriate, its location (i.e. being well related to existing settlements) or the impacts of development in the countryside that need to be considered.

5c What market signals could be most useful in plan making and decisions, and how could such information be best used to inform decisions?

6a The town centre policies will enable communities to encourage retail, business and leisure development in the right locations and protect the vitality and viability of town centres.

Do you: Strongly Agree/Agree/Neither Agree or Disagree/Disagree/Strongly Disagree

6b Further Comments

It is welcomed that the draft NPPF recognises that policies should support the vitality and viability and growth of town centres. In this respect it is also welcomed that the draft NPPF maintains the sequential approach for retail and leisure uses, preferring uses to be located in town centres 'where practical' and only in out of centre locations if suitable town centre and edge of centre sites are not available. The phrase 'where practical' requires clarity.

However concern is raised in that the way the draft NPPF is written seems to suggest that retail and leisure are the only town centre uses. It is important that office development is a use which should be located centrally close to transport links.

7a Transport

The policy on planning for transport takes the right approach.

Do you: Strongly Agree/Agree/Neither Agree or Disagree/Disagree/Strongly Disagree

7b Further Comments

It is welcomed that the draft NPPF acknowledges that different policies and measures will be required in different areas. However to reflect the rural nature of Cumbria needs to clearly reflect that sustainability in rural areas should not be determined principally on transport accessibility, but rather on policies that encourage appropriate development to support rural communities to be sustainable places to live and work and support the development of rural transport services.

Concern is raised that the draft NPPF loses the recognition of the importance of the integration of spatial planning and transport by maintaining the linkage between local transport plans and development plans. It is important to maintain these linkages as it gives a clear indication of the integral relationship between the location of development and the transport implications.

The draft NPPF is very limited on the positive policy promotion of compact settlements and mixed use development and that effective travel networks and efficient public transport systems can help to create sustainable and accessible places. Concern is raised that the draft NPPF loses the emphasis to identify sites following a search sequence. It is suggested that in order to provide clarity of how a sustainable pattern of development could be achieved in pattern reference could be made to the importance of locating levels of development appropriate to the scale of settlements.

The draft NPPF should recognise that statutory highway authority policy, (other than LTP), as a statutory undertaker.

Para 85 setting out that local authorities '*should work*' with neighbouring authorities and transport providers should be amended to read '*are to*' to provide certainty and clarity of provision of the duty to co-operate.

In respect of para 86. It is considered positive that the draft NPPF maintains the requirement that where developments have significant transport implications that Transport Assessments are prepared. The draft NPPF stated that the consideration what type and size development warrants a TA will be defined by local criteria. It is suggested that this criteria should be determined by the highway authority in conjunction with LPAs.

Further comment is made in respect of the bullet points

Bullet 1: provides insufficient certainty about how appropriate it would be to offset sustainable transport modes against major transport infrastructure

Bullet 3: this suggests consideration needs to be given to the potential to mitigate against the significant impact of development, *if cost effective to do so*. So if not cost effective does this mean that the impacts do not need to be mitigated against to secure permission? This bullet point goes on to that development should not be prevented or refused unless the residual impacts of development are *severe*. Clarity is needed on what is considered severe and what the test are i.e. severe congestion, safety, journey times, air quality. The cumulative impacts of developments which individually may not be significant but which collectively have very significant impacts on traffic and congestion and implications for sustaining levels of growth.

Para 90, support the continued inclusion of travel plans, but the draft NPPF should include targets for mode share. All travel plans should be appropriately secured and enforced.

The provision of parking is important in determining travel patterns and maximum parking standards for commercial development has shown to be effective. PPG 13 set out national maximum parking standards for non residential use, but LA's could set lower standards if evidenced. Positive to be able to set locally as we can assess what is appropriate to reflect local circumstances. However this needs to be done on a wider than local level, should not make one area have more car parking than other areas that might make them more attractive to development. It is consider that there is there merit in providing national advisory standards for different uses and locational requirements.

8a Communications infrastructure

Policy on communications infrastructure is adequate to allow effective communications development and technological advances.

Do you: Strongly Agree/Agree/Neither Agree or Disagree/Disagree/Strongly

Disagree

8b Further Comments

Support that this section provides a positive policy statement. In respect of the need facilitate the growth of communication infrastructure. It is also considered positive that the policy retains the importance of siting and appearance and the sequential approach to the installation of new communication infrastructure.

However concern is expressed that it loses the emphasis of considering the deployment of communication infrastructure within the context of established policy on the protection of countryside and urban areas NP's AONBs SSSIs, listed buildings and conservation areas. In respect of the Cumbrian context it is important to maintain reference, given the extent of designated areas. This should not necessarily mean a ban, but particular care and attention given to siting and design in these areas.

In order to ensure that communication infrastructure is an integral part of future growth reference should be made which encourages prospective developers of new housing, office and industrial estates to consider all relevant communication infrastructure needs of there development and how they connect to the wider network.

Reference should also be made for the need for flexibility as equipment and technical requirement will change. The policy should set out that operators have different requirements and as such there is a need to appreciate that different systems require different antenna types, siting needs. There is a need to recognise that there are limitations imposed by the nature of the communication network and the technology. In this respect it may also be useful to retain the point made in PPG 8 that some minor operations or change of use of land may not constitute development which requires planning permission, and that certain types on communications infrastructure may be covered by the *de minimis principle*.

Policy should encourage a good level of broadband speeds consistently over both rural and urban areas. Cumbria has been chosen by BDUK as one of the first areas to trial superfast broadband through the Accessible Cumbria project. This is a project which seeks to enable a fast and affordable broadband service across the County by 2015. With private sector investment it is hoped that of all homes and premises will have access to at least 2MB per second broadband and in most cases significantly better.

In respect of detailed point paragraph 97, bullet 2 the requirement for LPA to ensure that the construction of new buildings or other structures does not cause interference with broadcast and telecommunications services would require detailed technical information to provided with planning applications. The requirement s is not on the national list for validation purposes.

In respect of the necessary evidence to justify proposed development para 98, instead of 'should be supported by' it should read 'must be supported by'.

9a Minerals

The policies on minerals planning adopt the right approach.

Do you: Strongly Agree/Agree/Neither Agree or Disagree/Disagree/Strongly Disagree

9b Further Comments

It is noted that in para 7 it is advised that PPS10 will continue in use until "national waste planning policy is published alongside the National Waste Management Plan for England". In addition reference should be made to the Waste Regulations (2011).

The NPPF should also refer to the National and Regional Guidelines for Aggregates Provision in England (2001-2016) – prepared by the Aggregates Working Parties, which includes apportionments and landbanks.

Para 106 relates only to coal extraction, the policy considerations would be equally applicable to other mineral extraction – either mention them all or none at all

Reference should be made to the risks from legacy coal workings (i.e. subsidence, build up of gases, stability of tips, etc.). Cumbria County Council is aware that the Coal Authority was very keen for this to be taken into account during the production of their M and W DF Site Allocations DPD.

10a Housing

The policies on housing will enable communities to deliver a wide choice of high quality homes, in the right location, to meet local demand.

Do you: Strongly Agree/Agree/Neither Agree or Disagree/Disagree/Strongly Disagree

10b Further Comments

Para 107 (and 10 of Delivering sustainable development section) clarity is required as to what is meant by "increase significantly" the supply of new homes and "increase the supply of housing" from what? The RS (RSS), saved Local Plan or previous performance, and if the latter, over what period is it to be measured? How does this tie in with indentifying and meeting the 'requirements' plus 20%? Para 10 similarly states: "increased supply of housing to meet the needs of present and future generations". Further, para 55 of the Development Management Section on the presumption in favour of sustainable development states: "should achieve the delivery of enhanced levels of development"

Para 107 identifies a key objective of "creating sustainable, inclusive and mixed communities, including through the regeneration and renewal of areas of poor housing." How can this be achieved without public sector funding. The NPPF does not provide clarity on the help of non private sector funding regimes.

Para 108 states that delivering of housing should be consistent with the land use principles and other policies of the NPPF. As previously raised there are inconsistencies with the document. A consistent approach to setting out the principles and policies needs to be taken before this statement can be made.

Para 109, Bullet 1: Unclear about how sites should be allocated. It notes that Local Plans should identify key sites that are critical for the delivery of the housing strategy. Does this infer the identification of broad strategic sites, or simply all sites required to meet the defined housing targets. Para 14 (Sustainable communities section) advises that where a plan is silent, absent, or contains out of date policies, there should be a presumption in favour of sustainable development. Would this extend to allocations which are considered out of date? If this is the case, larger, strategic sites would be enabled to come forward, until such a time when an LPA publishes a strategic allocations document.

Bullet 2: Increasing the requirement for a 6 year supply of land (5 year + 20%) will make it more difficult for authorities to demonstrate a supply of land. In this instance, there will be a presumption for development. This, coupled with the need to undertake a housing implementation strategy for the 5(6) year supply, presents a desire for authorities to fall short upon their land supply and open their doors to development.

Footnote 5 – indicates that for a site to be deliverable, it requires a willing land owner, and a willing developer. Paragraph 39 of the 2007 DCLG guidance indicates that land is considered achievable if either there is a consenting land owner, or a developer has shown interest. Whilst only a small change to the wording, this could seriously undermine the 5 year land supply if both developer/landowner interest is required.

Bullet 3: Are the years 6-10 and 11-15 just for local plans or is the intention to publish this data annually in addition to the 5 year supply info in the AMR?

Bullet 4: There is no definition of windfall sites in the Glossary.

In some parts of Cumbria windfalls will continue to make a significant contribution to the actual supply of net additional dwelling. To ignore them except where there is "compelling evidence of genuine local circumstances that prevent specific sites being identified" whether in the local plan or in any rolling supply update, has an impact on properly managing supply and choice, this could be exasperated if 20% is added to allocations. It is suggested that a sensible proportion for windfall sites is added.

Bullet 7: Firstly the removal of the density threshold in PPS3 has not been given the same consideration to other issues in the Impact Assessment, which accompanies the NPPF. Allowing flexible densities requires an understanding and assessment of local areas, which is an issue not given full consideration in the NPPF. This factor, along with the removal of the brownfield target places more pressure on greenfield sites.

The move away from brownfield sites as sequentially preferable offers a new blueprint for determining the most suitable land. The impetus behind this may be due to fact that brownfield sites tend to bring with them remediation costs, which in turn reduce the viability of schemes, and facilitate less economic benefits a scheme may bring. Whilst this perhaps may encourage developers to bring forward greenfield sites more quickly, it will in turn discourage brownfield use in locations that still have a healthy supply.

It is therefore recommended that brownfield development is still regarded as the sequentially preferable choice for development. This would be applicable to authorities who, in their 5 year land supply demonstrate that over 60% of their land is on brownfield land. Those who fall under 60% do not need to meet these criteria. *(Suzanne could you expand on this please.....is 60% a complete cut off?? Would there be sliding scales of brownfield development depending on brownfield supply??)* A review of the land supply should therefore seek to identify suitable brownfield land. In doing this the policy will not accept unnecessary greenfield uptake, whilst allowing flexibility to those authorities who have a low percentage of brownfield land.

Para 110 is considered arbitrary and convoluted, and the bulk of this paragraph is repeated earlier in the document. It would be recommended that all but the last sentence are removed, and the sentence be added as a bullet point to para 109.

Policy and guidance on affordable housing is greatly reduced (para 111). A greater emphasis should be placed on creating mixed and integrated communities in the third bullet point. Affordable housing should be integrated into housing schemes to ensure that

affordable housing is indistinct within a development. Also there is no mention of supported/assisted living as part of affordable housing mix.

In general, the principles set out in para 112 are supported, where affordable schemes in rural locations have become unviable, and have not been able to proceed. There is however a need to clarify a number of terms in the last sentence which are crucial for interpretation. "To promote sustainable development, housing in rural areas should not be located in places distant from local services". Guidance should be provided as to what is considered to be accessible. In Cumbria we can test the accessibility of sites using Accession TM, a GIS based modelling package to calculate accessibility of development sites within 30 minutes public transport time, within 2km walking distance and 5km cycling distance of key services and facilities.

In addition clarification is required as to what local services are required to make a settlement considered suitable for additional housing.

Much of the detail contained in para 113 to enable rural housing in exceptional circumstances has been taken from previous PPS documents. One area of concern is bullet 3, which allows derelict buildings in the open countryside to be reused for residential housing. In rural locations, this relates to a number of barn/building structures that are inaccessible, and unsustainable. The policy does not advocate high standards of design, energy standards, or housing for local needs. This may lead to appropriate housing for those who are already land owners, and wish to develop at reduced costs. Conversely, it may lead to unsustainable development and increased land prices for land with disused buildings.

The intentions of this policy are uncertain. In previous circumstances, exceptions of this nature have been permitted to facilitate essential needs, such as workers dwellings, or local affordable housing. Whilst PPS5 introduced a policy that would safeguard buildings of significance in rural areas, this policy weakens the commitment towards sustainable development through a number of inappropriate policies.

11a Planning for Schools

The policy on planning for schools takes the right approach.

Do you: Strongly Agree/Agree/Neither Agree or Disagree/Disagree/Strongly Disagree

11b Further Comments

Comment on schools required.

Further comments on Sustainable Communities

Para 125 states that "*Local planning authorities should create a shared vision with communities of the residential environment and facilities they wish to see.*" However should the policy not aim to balance the aspirations and needs of the community, with a vision of what can be realistically delivered? Bullet 3: accessible development should also include cycle routes, and other forms of sustainable transportation.

Para 126 Bullet 1: sets out that planning policies should plan positively for the provision and integration of community facilities. Does this involve looking favourably towards applications, or allocating sites for these services? Planning can facilitate new development, but it cannot

control market forces. In Many rural areas, there is little reasonable prospect that new community services will be developed through the private sector alone.

Bullet 4: This point is contradictory and should not proceed in its current format. It is unclear what this paragraph hopes to achieve, as the latter part of the paragraph obviates the need for a sustainable strategy. It is agreeable that development should take place in locations considered suitable. Likewise, it should be the aim of the system to improve the sustainability of areas which have a lack of services and facilities. However, development should not be permitted to less sustainable areas, and implanted with sustainable measures.

Para 130. It is question whether this is a proposed mechanism for protecting 'village green' areas. The designation of which appears to be very subjective. This issue has not been correctly considered through the impact assessment. Local Green Spaces can only be brought into context through the allocation process – how are these developed – what determines the value of a green space? (aside from community feelings of conservation).

It is asserted that Authorities should assess the availability and viability of community facilities, though the types of facilities are not specified. This would involve assessing all known services. It is unclear whether these are to be enshrined as allocations, or just identified through a study. As well as developing an evidence base, the NPPF requires that LPAs devise a criterion for applicants to respond to when considering whether community buildings are viable. Both of these will place burdens and costs to Local Authorities.

12a Design

The policy on planning and design is appropriate and useful.

Do you: Strongly Agree/Agree/Neither Agree or Disagree/Disagree/Strongly Disagree

12b Further Comments

13a Green Belt

The policy on planning and the Green Belt gives a strong clear message on Green Belt protection.

Do you: Strongly Agree/Agree/Neither Agree or Disagree/Disagree/Strongly Disagree

13b Further Comments

There are no Green Belt designations in Cumbria. No comment is made in respect of this topic area.

14a Climate change, flooding and coastal change

The policy relating to climate change takes the right approach.

Do you: Strongly Agree/Agree/Neither Agree or Disagree/Disagree/Strongly Disagree

14b Further Comments

Climate Change

Very much welcome that the commitment to the climate change agenda is retained and the strong emphasis on the incorporation of energy efficiency measures and renewable energy infrastructure within developments.

Guidance is very streamlined compared to PPS22 and more streamlined than the Draft PPS on Planning for a Low Carbon Future in a Changing Climate. It appears to cover the key issues around providing a positive strategy for renewable energy deployment. However, all appropriate technologies should be referred to, or none at all. There appears to be no reason to identify deep geothermal over other technologies as set out in the current draft (para 152, 1st bullet).

It supports policy formulation that ensures adverse impacts are addressed satisfactorily. This approach is supported. Local authorities will need to include criteria based policy in their Local Development Frameworks to ensure adverse effects are addressed satisfactorily. In para 153, the NPPF should be strengthened to reflect the need for development management policies to ensure that renewable energy developments are supported where they clearly demonstrate they will have no unsatisfactory adverse social, economic or environmental impacts.

In streamlining the renewable energy policy to fit with the approach of the NPPF, the policy is now insufficient around the need to balance approaches to renewable energy generation and a low carbon economy with the need to ensure that adverse economic, environmental and social impacts resulting from development are managed satisfactorily. The draft NPPF promotes the presumption in favour of sustainable development which focuses more on economic development and a move towards a low carbon economy than environmental protection and effects on local amenity.

The policy, as worded, causes particular concern to undeveloped town edges and the wider countryside. The proposed document should provide policy that recognises that some types of renewable technology, such as wind turbines, are large and industrial in character and are often proposed in rural areas close to small villages and hamlets and that adverse impacts could arise. Key Principle (i) as set out in PPS22 refers to the need to support renewable energy developments where the technology is viable and environmental, economic and social impacts can be addressed satisfactorily. There is a need for a strong reference in any future NPPF to ensure that large scale renewable schemes are not sited in concentrations that could cause significant harm to local communities due to the scale and proximity of schemes to properties and villages. This is a growing concern in parts of rural Cumbria where wind energy schemes are being proposed close to each other and to properties and settlements.

The NPPF needs to be strengthened to reflect the need for renewable energy and low carbon development in nationally recognised designations to be compatible with and not harm the special qualities of the designation. This is recognised in the DECC Renewable and Low Carbon Energy Capacity Methodology (2010) developed to support renewable energy capacity assessments across the country.

It is important that the existing Practice Guidance relating to PPS1a and PPS22 are revised to support a streamlined NPPF. The guidance these provide is very important when interpreting current national planning policy and are likely to be even more important if policy is significantly streamlined, as proposed.

The removal of the need to set targets at the regional or local level is supported. However, further clarity on the role of targets should be provided especially as there are national

targets for carbon reductions and the amount of electricity and heat that needs to be generated from renewable sources. In addition to this clarity should be provided on the role of the planning system in supporting the DECC/Local Government Group Memorandum of Understanding (March 2011) around climate change mitigation and renewable energy deployment. This states the intention for local authorities to take firm action underpinned by locally ambitious targets and indicators that help reduce carbon emissions and create more appropriate renewable energy generation.

The NPPF suggests that LPAs should consider identifying suitable areas for renewable and low carbon energy sources where this would help secure the development of such sources. It states that LPAs should follow the approach set out in the National Policy Statement for Renewable Energy Infrastructure and the relevant sections of the Overarching National Planning Policy Statement for Energy Infrastructure. It also states that where areas are identified they should make clear the criteria that have determined their selection, and the size of development considered acceptable. The potential for local planning authorities to identify sites that are suitable for renewable and low carbon energy is supported in principle. Any site identification should only be carried out at the local authority/national park authority level. The need for site identification to be based on robust methodology is also needed. Detailed local information is likely to be needed to give developers confidence that proposals are likely to go ahead. Essentially, individual site assessments would need to be carried out to determine the potential range of issues that might need to be addressed. This is currently carried out by developers at their expense. Local planning authorities would not have the budget to do this. Therefore additional guidance is needed in the NPPF on the type of criteria that should form the methodology for any local site studies, and the scale at which it should be applied.

The NPPF could make reference to the need to base local studies on the DECC Renewable and Low Carbon Energy Capacity Methodology (2010) which can easily be adapted to ensure more locally relevant information is incorporated into a study. The use of the methodology would help provide a more consistent approach to such studies across the country.

Cumbria has carried out a renewable energy and low carbon capacity assessment based on this methodology. This was developed to reflect the high environmental quality of Cumbria and added new criteria to reflect some of the limitations of the methodology, for example, the regional methodology only considers proximity to settlements and not individual properties when considering the opportunities for wind energy, so a buffer around individual properties was added to reflect the dispersed patterns of settlement and individual dwellings across rural Cumbria.

The NPPF should clearly set out the criteria for any area identification and for criteria based policy rather than just referring to the issues addressed by National Policy Statement for Renewable Energy Infrastructure. This only relates to the issues around large scale onshore wind, biomass and energy from waste. Other renewable energy technologies will be deployed at the local level, such as hydropower and anaerobic digestion and other issues may need to be addressed. It would also provide much clearer guidance on what is expected if it was directly referred to in the NPPF. Clear guidance should be included in the NPPF on all the environmental, social and economic issues that need to be considered in order to be able to determine if adverse impacts are addressed satisfactorily. Such information will be critical in the implementation of any renewable energy targets and should not be lost from any future policy.

Further comment on land pollution policy

In respect of para 171. clarity is required on second bullet - in order to make the decision on suitability of site for proposed development – need full amount of information to be included with the planning application on previous use and ground conditions difficulty for local authorities to have a complete record/ information and guidance on the type of remediation needed.

Para 173 not clear and precise clarity/ further guidance of significant adverse impact on health and quality of life , suggest better to replace with removed from the text and replace with '*adverse impact on the surrounding amenity*'.

The last bullet '*identify and protect areas of tranquillity which have remained relatively undisturbed by noise and are prized for their recreational and amenity value for this reason*' is a little ambiguous would need to be more precise to assist planners/consultees when identifying policies or assessing the merits of applications. Para 173 does not make reference to assessing new development which are introduced near to a source of noise e.g. road, rail or aircraft or a mixed source. Would it therefore be appropriate to request that a noise impact assessment is submitted with an application which will help determine whether the development is suitable for use in that location?

Para 174. should be separated in two scenario's 1. reference to AQMA's specifically dealing with these areas. 2. Similarly even if there are AQMA's in place, planning policies should ensure that development(s) do not result in breaches of Prescribed Air Quality Objectives. Both of these may require conditions requiring modelling to prove the case.

14c The policy on renewable energy will support the delivery of renewable and low carbon energy.

Do you: Strongly Agree/Agree/Neither Agree or Disagree/Disagree/Strongly Disagree

14d Further Comments

14e The draft Framework sets out clear and workable proposals for plan-making and development management for renewable and low carbon energy, including the test for developments proposed outside of opportunity areas identified by local authorities.

Do you: Strongly Agree/Agree/Neither Agree or Disagree/Disagree/Strongly Disagree

14f Further Comments

14g The policy on flooding and coastal change provides the right level of protection.

Do you: Strongly Agree/Agree/Neither Agree or Disagree/Disagree/Strongly Disagree

14h Further Comments

Support that coastal policy is essentially unaltered and reflects that set out in PPS25 Supplement: Development and Coastal Change.

Reference should be made to use Shoreline Management Plans, where they are up to date, to support the identification of Coastal Change Management Areas.

Support the retention on the sequential and exception tests set out in PPS25 document in relation to flood risk assessments will remain in place.

With regards to flooding, new development should be planned to avoid development being brought forward in areas which are vulnerable. Where this is unavoidable care should be taken to ensure that risks can be managed through suitable adaptation measures, including through the planning of green infrastructure. The sequential and exception tests set out in PPS25 document will remain in place.

15a Natural and local environment

Policy relating to the natural and local environment provides the appropriate framework to protect and enhance the environment.

Do you: Strongly Agree/Agree/Neither Agree or Disagree/Disagree/Strongly Disagree

15b Further Comments

The NPPF is light on landscape and development in the countryside generally. It would appear to only apply to designated landscapes.

The NPPF moves away from the approach of PPS 7 Sustainable Development in Rural Areas and provides no targeted information for rural areas or countryside/landscape character. This approach should be reconsidered as development effects in the countryside can be more significant than in urban areas.

The proposed NPPF doesn't reflect the need to manage, protect and plan for all landscapes for their own value. This is set out in the European Landscape Convention, which the Government signed up to in 2006. It is not appropriate to only manage protect and plan for designated landscapes and features. National policy should also take into account the character of the landscapes that make up our rural countryside and our cities, towns and villages. The need to maintain diverse and living landscapes is reflected in the recent Natural Environment White Paper and the NPPF needs strengthening to reflect this objective. It should refer to the need to reflect local landscape character and recognise the contribution of biodiversity and the historic environment in shaping our landscapes. It should remove the reference to landscape areas and refer to landscape character instead.

It is not clear what types of designated sites are being referred to as only SSSIs are referred to in the footnote. Clarity is required as to whether it is just referring to nature conservation sites or does it apply to landscape sites. If the latter are referred to what is meant by local landscape designations. If it is Local Green Space, as set out in Para 130-31, this should be clarified. If the policy seeks to enable other local landscape designations to be developed it should state this and should ensure it is based on robust landscape characterisation.

The objective to set criteria based policies to enable proposals to be judged is supported, however the judgment should be made against features that are important to landscape character and not just protected wildlife sites or landscape areas (as currently referred to).

The NPPF also needs to be clear on its landscape terminology. What is meant by a 'landscape area' is unclear. If the NPPF is referring to protected landscape areas, i.e. AONBs or National Parks, it should state this more clearly. If it is referring to landscape character areas that can be identified through the landscape characterisation process, it should state this and also refer to landscape types. This objective should then be widened to include non designated/protected landscapes to reflect wider countryside character too. It is not acceptable to only refer to landscape designations when the Government is committed to ensure plan making reflects the concepts of 'all landscapes matter'.

There is a major omission around unprotected landscapes. This section refers to the need to plan positively to biodiversity networks, green infrastructure and the character of undeveloped coast. This fails to address any of the issues relating to rural landscapes. There appears to be no logical explanation to why undeveloped coastal landscapes should be maintained over and above other rural landscapes, other than the Government's plan to increase open access around the English coastline. It is unbalanced to just focus on coastal issues, when the same approach applies to open countryside, woodlands, and uplands.

Not all highly valued landscapes are protected by designation. Cumbria has a good quality landscapes that are highly valued both locally and at a county level. In some cases these landscapes are already valued nationally through landscape designation. In other places intrinsic landscape features are regionally, nationally or internationally protected through nature conservation and historic environment designations. Elsewhere they are considered to meet the national landscape designation criteria but there is no route to have this formally acknowledged. The majority of these landscapes and features are not protected formally, but have in the past been offered protection and management through criteria based policies that seek to maintain distinctive landscape character.

Additional guidance should be included in the NPPF to support the continuation of criteria based landscape policies that apply to all landscapes, rather than being selectively applied to coastal or protected landscapes, biodiversity networks and green infrastructure. This would bring the NPPF in line with the European Landscape Convention and better reflect the Government's objectives through the Countryside and Rights of Way Act as well as its objectives through the more recent Marine and Coastal Access Act. It would also enable local planning authorities to meet the presumption in favour of sustainable development with regard to the environment.

This section should also better align with the approach being taken to mapping biodiversity networks and should refer to the need to define and describe landscape character using the landscape characterisation process. This will assist with planning for biodiversity at the landscape scale and help with the implementation of criteria based policy. Landscape character assessments describe the characteristics that make a place distinctive and these characteristics should be managed and protected through the planning framework. Landscape character assessments are also required to help people identify what they value in a landscape. They are also needed to support any local landscape designations. The NPPF should be strengthened to better reflect the role of landscape character assessments in ensuring development is compatible with landscape character and minimises harm to the landscape.

The above approach is supported through Paragraph 34 which refers to the need for information to be based on up to date information on the natural environment and other

characteristics of an area. The Cumbria Landscape Character Guidance and Toolkit does this for Cumbria.

It is unclear if the NPPF supports local landscape designations. Further clarity should be given on this along with the role of Green Areas Protection, which the Government has pledged to provide more guidance on.

The need for planning policies to prevent harm to geological conservation interests is supported. Cumbria has numerous Regionally Important Geological Sites that already benefit from policy protection and this should be upheld through any future NPPF.

The conservation of wildlife and cultural heritage are important considerations in National Parks, the Broads and Areas of Outstanding Natural Beauty and should be given great weight in all these areas. The Countryside and Rights of Way Act clearly sets out that the protection and management of these are given equal weight in National Parks, the Broads and Areas of Outstanding Natural Beauty, so there is no reason why the NPPF should exclude AONBs from the reference of great weight being attached. The NPPF should be amended to ensure AONBs are included in this.

Support is given to the need to identify and protect areas of tranquillity which have remained relatively undisturbed by noise and are prized for their recreational and amenity value for this reason. However areas should be 'valued' rather than 'prized'.

16a Historic environment

This policy provides the right level of protect for heritage assets.

Do you: Strongly Agree/Agree/Neither Agree or Disagree/Disagree/Strongly Disagree

16b Further Comments

Despite the radical reduction in text, protection for heritage assets appears to remain an explicit part of the draft NPPF. The Historic Environment chapter (paras 176 – 191) broadly follows the principles of PPS 5 (2010). Presumably the Planning (Listed Buildings and Conservation Areas) Act 1990 remains in force.

The draft removes some arguably unnecessary repetition of the provisions of the 1990 Act that are present in the current PPS5.

However the draft NPPF loses the positive statement regarding the value of the historic environment to regeneration and the quality of places.

Demolition as an act of development is not referred to and needs reference. There could be a reference to spot listing.

In respect of para. 183, when considering the impact of a proposed development on a designated heritage asset, considerable importance and weight should be given to its conservation. PPS5 has a presumption in favour of the conservation of designated heritage assets. There should be alignment with the Planning (Listed Buildings and Conservation Areas) Act.

Para 183 does not give evident weight to the minor or moderate losses to the value of an asset that may be proposed. The incremental result of such losses may have a significant affect.

Para 185 retains a recognition of the value of non designated assets but leaves significant room for interpretation of what constitutes sustainable development which may be a negative aspect of this paragraph.

Para. 186 is unsatisfactory as there could be demolition of an asset and a temporary use of the land such as a car park. There could be no certainty that a developer will go ahead with a development even after a development has been given permission.

There is a concern that the historic environment is not sufficiently connected to other policy subjects. PPS5 is more clearly set out with usable policies. There needs to be practice guidance to support and expand on the general statements of the draft NPPF.

17a Impact Assessment

The Framework is also accompanied by an impact assessment. There are more detailed questions on the assessment that you may wish to answer to help us collect further evidence to inform our final assessment. If you do not wish to answer the detailed questions you may provide general comments on the assessment in response to the following question:

Is the impact assessment a fair and reasonable representation of the costs, benefits and impacts of introducing the Framework?

Do you have views on the consistency of the draft Framework with the draft planning policy for traveller sites, or any other comments about the Government's plans to incorporate planning policy on traveller sites into the final National Planning Policy Framework?

In July 2011 Cumbria County Council responded to the draft planning policy for traveller sites.

Within this response concerns were expressed about the loss of important guidance in respect to the development of evidence bases to support the identification of the land and planning requirements of gypsy and travellers, in particular there is concern about the proposed use of historical demand to act as the basis for the future determination of requirements. The response highlighted how the existing Gypsy and Traveller Accommodation Assessment (GTAA) evidence base approach ensured the development of robust and consistent evidence bases.

The response highlighted concerns about the potential emergence of significant inconsistencies between spatially related planning authorities. Given these concerns it was suggested that local planning authorities should receive stronger encouragement to develop consistent and compatible evidence bases.

The response highlighted the importance of utilising the most appropriate sites for gypsy and traveller accommodation. It highlighted that it will be important that community engagement seeks to build consensus to facilitate the delivery of schemes.

Particular concern was expressed about the suggested transitional arrangements mooted in the draft policy, in particular the proposal that Local Planning Authorities would have six months to put in place their five year supply, given that this measure could lead to hasty development of unsuitable planning policy.

It is understood that the final version of this policy will slot into the final NPPF which is undergoing preparation. Having made these comments previously, these comments now focus on the content of the consultation questions set out in the NPPF.

In the interests of consistency we appreciate the importance of putting the Government's guidance in respect to traveller sites within the NPPF alongside that relating to other forms of development. Notwithstanding this, given the unique nature of gypsy and traveller sites and consistent with our comments to the earlier consultation it is important that robust guidance be provided, given this, there may be merit in providing some additional external guidance to complement the policy set out within the NPPF. It is considered that any policy should be clear with respect to the how evidence used to consider requirements is developed and also how proposals would be considered in situations where not enough identified land to meet requirements.

Within the consultation on the draft 'Planning for traveller sites' it is made clear that the Government wishes for traveller sites to be considered in a manner consistent to other forms of housing. However in terms of the compatibility of the draft NPPF and the draft 'Planning for traveller sites' documents there appears to be a number discrepancies.

- The draft 'Planning for traveller sites' document states that sites should be identified for 'at least' a 15 year period, whereas the draft NPPF states that, 'where possible' housing sites should be identified for years 14-15.
- The draft 'Planning for traveller sites' states that land should be identified on a rolling 5 year basis, whereas in the draft NPPF requires the identification of a rolling 5 year supply with at least a further 20% to be provided.
- The draft 'Planning for traveller sites' fails to highlight or refer to the proposed presumption in favour of sustainable development.
- Policy D, of the draft 'Planning for traveller sites' makes reference to 'rural exception sites' these are a long established policy tool, but which have not been referred to within the NPPF's housing section.

Furthermore, given the development of proposals for neighbourhood planning, it is considered that there needs to be care in respect to how the process would operate and some thought may be given to how these both operate in respect to each other.

3 Impact Assessment Questions

- QA1** We welcome views on this Impact Assessment and the assumptions/estimates contained within it about the impact of the National Planning Policy Framework on economic, environmental and social outcomes. More detailed questions follow throughout the document.
- QA2** Are there any broad categories of costs or benefits that have not been included here and which may arise from the consolidation brought about by the National Planning Policy Framework.
- QA3** Are the assumptions and estimates regarding wage rates and time spent familiarising with the National Planning Policy Framework reasonable? Can you provide evidence of the number of agents affected?
- QA4** Can you provide further evidence to inform our assumptions regarding wage rates and likely time savings from consolidated national policy?
- QA5** What behavioural impact do you expect on the number of applications and appeals?
- QA6** What do you think the impact will be on the above costs to applicants?
- QA7** Do you have views on any other risks or wider benefits of the proposal to consolidate national policy?
- QB1.1** What impact do you think the presumption will have on:
i. the number of planning applications;
ii. the approval rate; and
iii. the speed of decision-making?
- QB1.2** What impact, if any, do you think the presumption will have on:
i. the overall costs of plan production incurring by local planning authorities?
ii. engagement by business?
iii. the number and type of neighbourhood plans produced?
- QB1.3** What impact do you think the presumption in favour of sustainable development will have on the balance between economic, environmental and social outcomes?
- QB1.4** What impact, if any, do you think the presumption will have on the number planning appeals.
- QB2.1** Do you think the impact assessment presents a fair representation of the costs and benefits of the policy change?
- QB2.2** Is 10 years the right time horizon for assessing impacts?

Do you think the impact assessment presents a fair representation of the costs and benefits of this policy change?
- QB2.3** How much resource would it cost to develop an evidence base and adopt a local parking standards policy?

QB2.4 As a local council, at what level will you set your local parking standards, compared with the current national standards?

Do you think the impact assessment presents a fair representation of the costs and benefits of this policy change?

QB2.5 Do you think the impact assessment presents a fair representation of the costs and benefits of the policy changes on minerals?

The policy changes set out in the Impact Assessment should not cause Cumbria any problems. We last gave a permission for peat extraction in 2001, but this was a consolidation of earlier consents; and we are not that prescriptive with landbanks, but take into account spatial distribution of sites and markets too. Cumbria already considers scarcer minerals and has a landbank for high spec roadstone (15 years) and for gypsum:

QB3.1 What impact do you think removing the national target for brownfield development will have on the housing land supply in your area? Are you minded to change your approach?

QB3.2 Will the requirement to identify 20% additional land for housing be achievable? And what additional resources will be incurred to identify it? Will this requirement help the delivery of homes?

QB3.3 Will you change your local affordable housing threshold in the light of the changes proposed? How?

QB3.4 Will you change your approach to the delivery of affordable housing in rural areas in light of the proposed changes?

QB3.5 How much resource would it cost local councils to develop an evidence base and adopt a community facilities policy?

QB3.6 How much resource would it cost developers to develop an evidence base to justify loss of the building or development previously used by community facilities?

QB3.7 Do you think the impact assessment presents a fair representation of the costs and benefits of the Green Belt policies set out in the Framework?

QB4.1 What are the resource implications of the new approach to green infrastructure?

QB4.2 What impact will the Local Green Space designation policy have, and is the policy's intention sufficiently clearly defined?

QB4.3 Are there resource implications from the clarification that wildlife sites should be given the same protection as European sites?

QB4.4 How will your approach to decentralised energy change as a result of this policy change?

QB4.5 Will your approach to renewable energy change as a result of this policy?

QB4.6 Will your approach to monitoring the impact of planning and development on the historic environment change as a result of the removal of this policy?